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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

Rulemaking 06-05-027
(Filed May 25, 2006)

SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER

Pursuant to Article 2.5 of the Commission's Rules of Practice and Procedure (Rules), this Scoping Memo and Ruling addresses issues, schedule and other matters necessary to scope this proceeding. The Commission's Rules are available on the Commission's web page.¹

1. Background

This proceeding continues implementation and administration of the California Renewables Portfolio Standard (RPS) program, as a successor to Rulemaking (R.) 01-10-024 and R.04-04-026.² This includes Commission

¹ The Commission's web page is at: <http://www.cpuc.ca.gov>. References to Article 2.5 and specific rules in this Scoping Memo are with respect to existing rules. The Commission has adopted revised rules, which will become effective upon approval by the Office of Administrative Law. When effective, the new rules will be published on the Commission's web page. The new rules will include changes to article and rule numbers. While the numbers will be different, none of the articles or rules referenced herein are substantially changed in such a way that it will require revision of this Scoping Memo.

² The California RPS Program was established by Senate Bill (SB) 1078 (Stats. 2002, Ch. 516, Sec. 3, codified as Pub. Util. Code §§ 399.11 et seq., chaptered September 12, 2002, effective January 1, 2003).

oversight of the RPS procurement cycle, reporting, compliance, enforcement, and policy issues related to ongoing implementation and administration.

2. Categorization

The Commission preliminarily categorized this matter as ratesetting. No party objects. I find that the category is ratesetting. This ruling may be appealed. Appeals, if any, must be filed and served within 10 days. (Rule 6.4.)

3. Ex Parte Communications

Ex parte communications are governed by the Commission's Rules. In particular, in a ratesetting proceeding, ex parte communications are permitted only if consistent with certain restrictions, and are subject to reporting requirements. (*See* Rules 7(c) and 7.1, and Section 1701.3(c).³)

4. Need for Hearing

The Commission preliminarily determined that this matter will require hearing. No party persuasively argues to the contrary. I find that hearing is needed. This Scoping Memo adopts a procedure for later setting the specific hearing schedule, to the extent ultimately required. (Rules 6(a)(3) and 6.1(a).) In particular, parties shall file motions for hearing as provided in the schedule. Alternatively, the Administrative Law Judge (ALJ) may adopt a schedule for hearing as necessary.

5. Issues and Schedules

Ongoing implementation and administration of the RPS program may involve several matters. For example, these might include, but are not necessarily limited to: (a) the procurement cycle (e.g., completing the 2005

³ All Section references are to the Public Utilities Code unless noted otherwise.

solicitation; the 2006 solicitation; review of, and decision on, draft 2007 RPS solicitation plans; implementation of the 2007 solicitation); (b) the reporting decision and subsequent reports; (c) compliance and enforcement based on reports; and (d) ongoing implementation and administration (e.g., comments and reply comments on policy issues; implementation and administration of policy decided elsewhere, such as in R.06-02-012).

It is premature to scope out all potential issues and schedules. Specific issues will be scoped, and schedules adopted, for each matter subsequently as necessary and appropriate. At this time, attention will be focused on two items: (a) consideration of limited policy issues related to ongoing implementation and administration; and (b) review of, and decision on, the draft 2007 RPS solicitation plans.

Issues and schedules, other than regarding these two items, which a party believes should be considered in this proceeding should be brought to the ALJ's attention as soon as a party believes it is timely to do so. Candidate issues and schedule should be identified in a filed and served motion, with responses due within five days. They may also be identified in other ways as provided by the ALJ (e.g., at a subsequent prehearing conference).

The two items to be considered now, and the accompanying procedures, are as follows:

5.1. Ongoing Implementation and Administration

Limited policy issues for Commission consideration regarding ongoing implementation and administration are stated in Attachment A. Parties may file and serve comments and reply comments according to the schedule in Attachment B. Energy Division staff may conduct a workshop to facilitate application of lessons learned from prior solicitations to these policy questions.

A motion for hearing may be filed, as provided in the schedule. If filed, such motion shall state: (a) the specific disputed fact or expert opinion in a pleading (e.g., comment, reply comment) for which hearing is sought, (b) justification for hearing (e.g., why the fact or opinion is disputed and material), (c) what the moving party would seek to demonstrate through hearing, (d) a proposed schedule, and (e) anything else necessary for the purpose of making an informed ruling on the motion. A response to any such motion may be filed and served, and will be due on the date in the adopted schedule. If motion for hearing is made and granted, the schedule will be modified as necessary at that time. These and other dates may be modified by the ALJ as necessary for efficient and reasonable conduct of this proceeding.

5.2. Draft 2007 RPS Plans

Unless and until changed, RPS solicitations are on an annual cycle. This process is initiated by RPS obligated entities filing draft RPS solicitation plans for Commission review. After review, the Commission must accept, modify, or reject each plan. (§§ 399.14(a) and (b).) A summary of what should be included in each plan is included in Attachment C. A schedule for the necessary tasks is contained in Attachment D, with the goal of a Commission decision by early 2007.

6. Record

The record will include all filed and served documents and pleadings (e.g., reports, compliance filings, comments, reply comments, motions, responses, opening briefs, reply briefs). To facilitate creation of a reliable record upon which the Commission may rely for reasonable decision-making, all

documents (e.g., reports, compliance filings, comments, reply comments) filed after the date of this Scoping Memo shall be verified.⁴ (See Rules 2.4 and 88.)

The record will also include reports and documents adopted by the California Energy Commission (CEC), to the extent identified and relied upon by a party. The Commission may also take official notice of CEC documents, as necessary and reasonable. Finally, the record will also include testimony and exhibits received at hearing, if held.

To the fullest extent reasonably possible, parties should use the same outline for simultaneous pleadings (e.g., comments, reply comments, opening briefs, reply briefs, draft 2007 RPS Plans). This practice promotes understandability, consistency and completeness. Parties should agree on a common outline for these pleadings, and bring unresolved disputes to the attention of the ALJ. Such disputes, if any, should be brought to the attention of the ALJ with adequate time before the filing date to permit reasonable resolution of disputes.

7. Overall Proceeding Schedule

Issues and schedules are adopted in this Scoping Memo. As necessary, further issues will be scoped, and schedules adopted, in subsequent Scoping Memos. It is my intention, however, consistent with both the law and the Order Instituting Rulemaking, to complete this proceeding within 24 months of the date of this Scoping Memo, or by August 18, 2008. (Pub. Util. Code § 1701.5(a).)

⁴ A party unable to verify an entire document must separate, or otherwise clearly identify, the portion subject to verification from the portion not subject to verification.

8. Final Oral Argument

A party in a ratesetting proceeding has the right to make a Final Oral Argument (FOA) before the Commission, if the FOA is requested within the time and manner specified in the Scoping Memo or later ruling. (Rule 8(d).) Parties shall use the following procedure for requesting FOA.

Any party seeking to present FOA shall file and serve a motion at any time as reasonable, but no later than the last date comments are due to be filed and served on a draft or proposed decision. The motion shall state the request, the subject(s) to be addressed, the amount of time requested, recommended procedure and order of presentations, and anything else relevant to the motion. The motion shall contain all the information necessary for the Commission to make an informed ruling on the motion, providing for an efficient, fair, equitable, and reasonable FOA. If more than one party plans to move for FOA, parties shall use their best efforts to present a joint motion, including a joint recommendation on procedure, order of presentations, and anything else relevant to the motion. A response to the motion may be filed within two days of the date of the motion.

If a final determination is subsequently made that no hearing is required, Rule 8(d) shall cease to apply, along with a party's right to make an FOA.

9. Service List

The service list is on the Commission's web page.⁵ Parties are responsible for ensuring that the correct information is contained on the service list, and

⁵ The service list may be accessed via the following link:

<http://www.cpuc.ca.gov/proceedings/R0605027.htm>

notifying the Commission's Process Office and other parties of corrections or ministerial changes. Substantive changes (e.g., to be added or removed as an appearance) must be made by motion or at hearing.

10. Principal Hearing Officer

ALJ Burton W. Mattson is the Principal Hearing Officer.

IT IS RULED that the matters addressed in the body of this ruling are adopted including:

1. The categorization of this proceeding is ratesetting for the purposes of Article 2.5 of the Commission's Rules of Practice and Procedure (Rules).
2. Ex parte communications are permitted with restrictions, and are subject to reporting requirements. (*See* Rules 7(c) and 7.1, and Section 1701.3(c).)
3. Hearing is necessary, and a specific schedule shall be determined based on motions, or as otherwise determined by the Administrative Law Judge (ALJ).
4. The issues and schedules are determined as stated in Attachments A, B, C and D. Further issues and schedules shall be adopted as appropriate and necessary. Parties shall file motions proposing issues and schedules for subsequent matters to be addressed herein when timely, or as otherwise provided by the ALJ. Responses to such motion, if any, shall be within five days.
5. The record shall be composed of all filed and served documents and pleadings. All filed documents shall be verified. The record shall also include California Energy Commission reports and documents identified as part of the record. If hearing is held, the record shall also include evidence received at hearing.
6. Parties shall use the same outline for all common or similar pleadings and documents (e.g., comments, reply comments). Parties shall bring disputes, if

any, to the attention of the ALJ as soon as possible, but with sufficient time to permit reasonable resolution before the pleading is due.

7. This proceeding should be concluded within 24 months of today, absent written finding otherwise.

8. Parties shall follow the procedure stated in the body of this Ruling in making any request for Final Oral Argument.

9. Parties are responsible for notifying Process Office and other parties of corrections and changes to the information stated on the official service list, including electronic mail addresses, and ensuring that the information is current and accurate. Substantive changes must be made by formal written motion, or at hearing.

10. ALJ Burton W. Mattson is the Principal Hearing Officer.

11. The ALJ may modify the schedule adopted herein as necessary for reasonable and efficient conduct of this proceeding.

Dated August 21, 2006, at San Francisco, California.

/s/ MICHAEL R. PEEVEY

Michael R. Peevey
Assigned Commissioner

ATTACHMENT A

ISSUES R.06-05-027

Respondents shall, and parties should, comment on the following seven policy issues related to ongoing implementation and administration, including comments on some or all of the individual areas identified within each of the seven issues below. In addition, the three largest investor owned utilities (IOUs) shall provide proposals, as described below, regarding the procurement cycle (Issue 1) and repowering (Issue 4), along with the first report on their project evaluation and selection process (Issue 7).¹

Comments are best if specific and concrete. To be most useful and convincing, recommendations must include the specific action to be taken by a party or the Commission, or the specific language for party or Commission adoption (e.g., in a decision, in the request for offer (RFO) of a load serving entity (LSE), in a standard contract between a renewables portfolio standard (RPS) eligible generator and an LSE).

1. Procurement Cycle

The Commission recently noted that it has been pursuing reasonably structured annual procurement cycles, but there may be benefits to a process that is more (or fully) continuous. (Decision (D.) 06-05-039, page 56.) Parties should comment on whether or not to, and how best to:

1.1 Maintain and administer an annual procurement cycle,

¹ The three largest IOUs are: Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E).

- 1.2 Change to a continuous approach,
- 1.3 Change to some other cycle,
- 1.4 Combine the RPS with all-source bidding,
- 1.5 Simplify the procurement cycle in some other way,
and/or
- 1.6 Anything else a party recommends regarding the
procurement cycle.

In particular regarding a continuous RPS solicitation, one approach might be to have permanent LSE solicitations open and available at all times to all potential RPS suppliers, including continuous use of the last RFO and standardized contract approved by the Commission. It might involve periodic updates to very limited parts of the RFO or standardized contract only as needed (e.g., updated for revised time of delivery factors). It might also involve periodic “closing dates” for the purpose of determining the market price referent (MPR), evaluating all pending bids submitted up to the closing date, initiating final contract negotiations, and initiating an application for supplemental energy payments (SEPs) with the California Energy Commission (CEC), as needed.

To assist the Commission in evaluating this option, the three largest IOUs shall each make a proposal (or collectively make one joint proposal) regarding how a continuous solicitation would work, be implemented and be administered by the Commission. The IOUs are not obligated to argue in favor of this proposal, and may state reasons in opposition.

Further, the Commission expects to eventually combine the RPS bidding process with the long-term all source procurement process. This may or may not be possible after completion of the 2007 RPS solicitation cycle. Parties may also comment on the approach of utilizing only one all-source solicitation, and how and when to make the transition. Alternatively, parties may recommend other

ways to simplify the procurement cycle. All proposals, to be most useful and convincing, must contain concrete and specific recommendations.

2. Risk-Sharing

All long-term arrangements treat or share risk in some manner. The treatment of risk, or risk-sharing, is an important element of long-term electricity procurement. This includes procurement from a utility-owned resource, a third-party-owned resource via an all-source bid, a qualifying facility (QF), or from an RPS generator. For example, risks may occur with respect to input and output prices, environmental responsibilities, project milestones, project initial operation, scheduling of output, variations in output, delays in transmission system additions, treatment in the case of project failure, and other factors. These may or may not involve future events unforeseen at the time a utility plant was approved and built, a contract resulting from an all-source bid was signed, an avoided cost was set for a QF standard offer, or the MPR calculated and the RPS contract finalized. Alternatively, they may be foreseen and treated in some manner in the contract.

Recently on this topic, PG&E offered these comments to the CEC:

“The CEC should be aware that in a commercial setting, it is not uncommon for the buyer to retain the risk of cost escalation due to factors such as inflation or other specific input. It is recognized that this type of accommodation relieves the seller of the cost of compensating for the risk and could result in a lower price being offered to the buyer. PG&E believes that such risk sharing could be accomplished in its renewables power purchase agreements, given acceptable limitations on the percent of purchase price at risk and the escalation factor.” (Comments of PG&E to CEC on the 2006 Integrated Energy Policy Report Update Mid-Course Review of the RPS Process, July, 12, 2006, p. 4.)

With this in mind, parties should:

- 2.1 Identify the risks now in the RPS program, and the way risks are now treated and/or shared between program participants, LSE shareholders, and ratepayers,
- 2.2 Compare this treatment or sharing with ways that risks are treated or shared in other portions of the electricity market,
- 2.3 Address the role in the RPS program for the risk mitigation tools presented at the June 27, 2006 CEC workshop on reducing the cost of capital for generation projects,
- 2.4 Recommend changes, if any, to the way risks are treated and/or shared in the RPS program to improve efficiency and equity, and/or achieve a more optimal price/quantity outcome in this market, and
- 2.5 Address any other aspect of risk treatment and risk-sharing believed material and relevant.

One example may be with respect to prices. The MPR is currently based on a forecast of natural gas prices for up to 26 years. There is uncertainty with regard to that forecast. Nonetheless, long-term investment decisions must be made, even in the face of great uncertainty.

Great upset has been experienced several times in California in the last 20 years when actual prices have varied from price forecasts used to cost-justify power plants or long-term contracts.² The concern has sometimes

² For example, energy payments to many QFs were fixed for 10 years based on a forecast of gas prices. (Standard Offer No. 4, Energy Price Option 2.) Actual gas prices varied from the forecast. This resulted in great upset, leading to contract renegotiations, buyouts and market restructuring. During the California energy crisis in 2001, the California Department of Water Resources entered into long-term contracts. Some parties now believe those prices are unreasonable. Relief may or may not continue to be sought in the form of possible renegotiation or price restructuring of those contracts. At

Footnote continued on next page

resulted in contract renegotiation, contract buy-out and electric market restructuring. While no party – neither generators, utilities, shareholders, nor ratepayers – can avoid all price risk, it may be wise to re-examine the risk-sharing relationship within the parameters of the RPS Program to ensure that it is reasonable.

In particular, at least one LSE requires RPS generators to submit bid prices that are fixed each year, without allowing prices to be indexed.³ The bidder must forecast a price (or price stream) and lock in prices for up to 20 years. The 20 year duration appears to be longer than experienced before in California in most (if not all) cases for this type transaction.

This approach appears to put the entire risk on ratepayers of the fixed price being greater than the actual market price in any future year, while it seemingly puts the entire risk on the RPS generator of the fixed price being lower than the actual market price in any future year. This may or may not be the best approach for ratepayers and generators. Allowing some or all of the contract price to be indexed (e.g., to some economic measure) may share some or all of the future risk between ratepayers and the project. Alternatively, requiring a periodic true-up of the contract price to actual market prices and conditions (e.g., every two years, five years, ten years) may allow some risk to be shared.

Some element of risk sharing may be more reasonable than putting the entire risk on either the project or ratepayers. Said differently, placing the entire

least one merchant generator now in bankruptcy is understood to assert, among other things, that energy price payments below what might otherwise be justified by current market levels have caused unreasonable financial strain.

³ See PG&E Solicitation Protocol, Revised June 23, 2006, page 24.

risk on the project may prevent otherwise desirable projects from being proposed and developed. Placing the entire risk on ratepayers may unreasonably cause otherwise undesirable projects to be developed. At least theoretically, a more optimal balance might be possible.

Other proposals for long-term contracts are being considered in the Commission's long-term procurement proceeding. (R.06-02-013.) One option under consideration there is a "tolling contract." This contract might fix the capacity price, but permit the payment of actual variable costs. Parties may comment on whether the Commission should examine using the same contract options, including tolling contracts, for all sellers, including RPS projects.

Parties should comment on all material and relevant aspects of risk treatment and risk-sharing to assist the Commission assess the subject and reach the most optimal result. To be most useful, a party seeking specific results must include specific and concrete recommendations. Parties should comment on the use of tolling contracts, and similar contract options in general, in order to provide the Commission with good information and a complete record upon which to reach its decision.

3. Standard Terms and Conditions

Parties should identify and/or comment on:

- 3.1 Identify contract terms and conditions that need improvement, and propose specific recommendations,
- 3.2 Address whether or not the Commission should require each LSE to employ the same contract structure (even if not the same language),
- 3.3 Address whether or not the Commission should require each LSE to employ the same contract with the same contract language,

- 3.4 Identify the specific contract language that requires significant waiver of rights,
- 3.5 State the reasons for and against inclusion or exclusion of such broad waiver language,
- 3.6 State whether or not the Commission should require elimination of broad waiver language in some or all contracts,
- 3.7 State whether or not individual contract negotiations and/or bilateral contracts should always be permitted even if contracts are further standardized, and
- 3.8 State anything else reasonably necessary to fully address improvements, if any, to RPS contracts.

CEC generally supports improvements in this area, saying:

“The CPUC, in collaboration with the Energy Commission, should also develop standardized power purchase contracts to speed up the contract negotiation process between IOUs and renewable bidders. Provisions related to definitions, construction milestones, penalties, force majeure, operating reporting requirements, security, and other non-commercial terms should be standardized for three contract types (baseload, as-available, and peaking) while commercial terms such as term, delivery point, contract price, and contract quantity would remain subject to negotiation.”
(CEC Integrated Energy Policy Report 2005 (IEPR), November 2005, p. 109.)

In this context, one potential improvement might be to further standardize limited and specific contract terms and conditions. The goal would be to make the process more efficient and less costly for all participants, including electric corporations, renewable generators, and the Commission. This might reduce the time necessary for review of draft RPS Plans, plus the amount of time needed for the solicitation, negotiation and contract execution, thereby streamlining the entire implementation, administration and regulatory process.

Another improvement might be for the Commission to require each LSE to use the same outline and structure for its standardized contracts.⁴ The goal would again be to reduce administrative cost and burden on the Commission and program participants.

Another improvement might be for the Commission to require all LSEs to use not only the same standardized contract structure, but also the same contract language throughout (or at least in more instances than now required). This would further simplify the review process and reduce the administrative cost on RPS generators when they submit a bid with more than one LSE.

Finally, some current RFOs contain broad waiver of rights language. For example, at least one LSE expressly requires each bidder to waive all constitutional and statutory rights concerning or related to its solicitation.⁵ The LSE reserves the right to automatically disqualify any bid from further consideration, and may terminate the entire solicitation for all bidders, if any one bidder complains about the solicitation. The RFO also limits the ways in which the bidder may complain. Further, the bidder is required to indemnify the LSE

⁴ For example, PG&E and SDG&E use standard contracts wherein Article One is General Definitions. SCE uses a standard contract wherein Article One is Special Conditions. For PG&E and SDG&E, Article Five involves Events of Default and Remedies, but PG&E's Article Five also includes Performance Requirement. Moreover, PG&E's Article Five has six sections while SDG&E has seven sections. These sections may overlap in content, but also have differences in subject titles. SCE treats Events of Default and Remedies (but not Performance Requirement) in its Article Six, and has only three sections, using section titles different from those of PG&E and SDG&E. The differing contract structures may cause some confusion, or at least take prospective bidders potentially unnecessary additional time to understand each standardized contract before submitting a bid.

⁵ See PG&E Solicitation Protocol, Revised June 23, 2006, page 43.

against any and all claims from other bidders in response to an asserted claim or complaint. Other LSE RFOs might contain similar language. These conditions may or may not be unreasonably chilling on bidders. Alternatively, they may reasonably balance parties' competing rights in otherwise litigious situations.

Parties should identify language that requires broad waiver of rights, or expansion of liabilities. Parties should comment on whether or not this is a reasonable sharing of these rights and responsibilities, and, if not, propose and justify specific alternative language. To be most useful and convincing, each proposal must contain concrete and specific recommendations, and include specific proposed language for Commission adoption.

4. Repowering

Repowering opportunities continue to be of interest to many. These may include, for example, replacing an older wind facility with one on the same site that is more efficient and generates more output. Some parties have stated that improvements in the RPS program may increase these opportunities. Parties should comment on:

- 4.1 The feasibility of repower opportunities,
- 4.2 Specific changes to the RPS program to facilitate repower opportunities, and
- 4.3 Anything else material and relevant to the repowering issue that the Commission should consider on the matter.

To assist the Commission evaluate this option, the three IOUs shall each make a proposal (or collectively make one joint proposal) on repowering. The proposal must address currently known impediments, such as limitations on federal tax incentives. (See CEC IEPR 2005, p. 116.) It must include standardized contract language related to repowers, to the extent desirable and/or reasonable.

The IOUs are not obligated to argue in favor of this proposal, and may state reasons in opposition.

In order to be most useful and convincing, any party recommending changes in the RPS program regarding repowering must propose specific language to accomplish program improvements. For example, this might be specific changes in standard contract terms and conditions.

5. Biomass

The Commission “is requested to initiate a new proceeding or build upon an existing proceeding to encourage sustainable use of biomass and other renewable resources by the state’s investor-owned utilities.” (Governor’s Executive Order S-06-06, dated April 25, 2006.) In particular, Executive Order S-06-06 sets targets regarding the use of biomass to generate electricity. Those targets are 20% within the established state goals for renewable generation for 2010 and 2020.

Further, as part of the Bioenergy Interagency Working Group, the Commission recently issued a Bioenergy Action Plan for California. Among other things, this Action Plan states:

“As requested by the Governor, the California Public Utilities Commission will develop policies and establish mechanisms that would encourage increased future development and sustainable use of biomass and other renewable resources by the state’s investor-owned utilities. Specific actions in 2006-2007 may include:

- a. Jointly investigating with the Energy Commission ways to simplify and streamline the RPS process to ensure that biomass and other renewable generation meets RPS goals.

- b. Reviewing and streamlining interconnection requirements to remove potential barriers to biopower development.
- c. Allowing investor-owned utilities to continue offering net metering for biopower facilities and support legislation to increase net metering caps.
- d. Assessing the costs and benefits of providing specific exemptions to allow biomass facilities to wheel power directly to a farm and to consolidate net metering accounts on a farm.
- e. Implementing mechanisms, including establishing appropriate avoided costs and long-term contracts, to preserve existing biopower facilities.
- f. Evaluating unique benefits that biopower may provide in meeting resources adequacy and RPS requirements and global climate change reduction targets.” (Bioenergy Action Plan for California, CEC-600-2006-010, July 2006, pp. 8-9.)

With these items in mind, parties should comment on:

- 5.1 How to efficiently, effectively and optimally reach these 20% biomass targets in a manner consistent with the otherwise resource neutral approach taken in Pub. Util. Code § 399.11 et seq. and the RPS Program,
- 5.2 What changes, if any, are needed in current reporting protocols to effectively, efficiently, and timely measure and report on these targets,
- 5.3 What compliance requirements and enforcement mechanisms, if any, should apply to these biomass goals,
- 5.4 Ways to simplify and streamline the RPS process not already addressed elsewhere that will ensure biopower generation meets RPS goals; streamlines

interconnection requirements; continues net metering; assesses wheeling directly to a farm; assesses consolidation of net metering accounts on a farm; implements mechanisms to preserve existing biopower facilities; and evaluates unique benefits of biopower in meeting resource adequacy, RPS requirements and global climate change reduction targets; and

- 5.5 Anything else a party believes material and relevant in relation to Executive Order S-06-06 and the July 2006 Bioenergy Action Plan for Commission consideration and implementation in this proceeding.

LSEs are under the Commission's direction to assess both quantitative and qualitative factors as part of bid evaluation. Moreover, LSEs are required to do a competent and consistent job within their Procurement Plans of stating the specific quantitative and qualitative evaluation criteria, and encouraging bidders to state benefits related to these factors. (D.06-05-039, p. 51.)

Regarding evaluation of the unique benefits of biopower, one approach may be for the Commission to order the inclusion of this factor within the list of evaluation criteria in the RPS Procurement Plans, just as LSEs must include environmental stewardship and water use as part of that consideration. (D.06-05-039, pp. 52-53.) Each bidder would then be encouraged to address any unique biopower benefits of the offered project relative to meeting resource adequacy, RPS requirements and global climate change reduction targets. LSEs would be required to consider this as a qualitative factor in their bid evaluation. Parties should comment on this approach, and may recommend other approaches.

6. Flexible Compliance After 2010

Commission flexible compliance rules are currently adopted in the context of LSEs reaching the goal of 20%, recognizing it may take several years to plan,

build, and initiate operation of a new power plant. After reaching 20%, flexible compliance rules are either unnecessary, or necessary in a narrower context. For example, after reaching a stable 20%, flexible compliance may be necessary only to account for normal and/or reasonable annual variations in output from the LSE's RPS portfolio (e.g., good or bad wind year), but not to account for project construction. Parties should comment on:

- 6.1 What flexible compliance rules, if any, are necessary after 2010 (or after attaining 20%) to account for normal and/or reasonable annual variations in output from the LSE's RPS portfolio, and
- 6.2 Anything else the party believes is material and relevant for Commission consideration regarding flexible compliance after reaching state goals.⁶

7. Other Program Improvements

Parties should comment on any additional ways to improve RPS program implementation and administration. In particular, parties should address, or comment on ways to:

- 7.1 Increase transparency,
- 7.2 Reduce complexity,
- 7.3 Facilitate equal treatment between all parties,
- 7.4 Improve application of least cost/best fit criteria,

⁶ State goals also include 33% by 2020. For example, the Governor has proposed a goal of 33% by 2020. (Energy Action Plan II (EAP II), October 2005, p. 8.) The CEC and Commission have adopted the following key action: "Evaluate and develop implementation paths for achieving renewable resource goals beyond 2010, including 33 percent renewables by 2020, in light of cost-benefit and risk analysis, for all load serving entities." (EAP II, p. 8, Key Action Item 5.) Parties may want to comment on flexible compliance in the context of 33% by 2020 in light of cost-benefit and risk analysis.

- 7.5 Develop better assessments of project viability,
- 7.6 Improve treatment of bid and other deposit requirements,
- 7.7 Improve and/or ease burdens on RPS generator participation,
- 7.8 Improve each LSE's opportunity to reach program goals,
- 7.9 Identify additional transparency needs (e.g., based on LSE evaluation and selection process reports, discussed further below),
- 7.10 Correlate those transparency needs with Commission orders on confidentiality (to identify what may be made public and what is subject to confidential treatment; see D.06-06-0667), and
- 7.11 Address any other program improvements that are material and relevant for Commission consideration.

In the interest of promoting several goals (including transparency), the Commission recently ordered the three largest IOUs to report on their project evaluation and selection process. (D.06-05-039, pp. 41-46.) The first such report is due with each IOU's 2006 solicitation short list. That short list is currently due approximately November 10, 2006.⁸

This report may be a useful tool to assist respondents and parties identify ways to improve RPS program implementation and administration. To facilitate this effort, each IOU should submit its first evaluation criteria and selection

⁷ This is not an opportunity to re-litigate D.06-06-066 and other Commission orders on confidentiality. Rather, it is an opportunity to concretely identify transparency needs and correlate those needs with existing orders. This will clarify the current status and permit consideration of improvements, if any.

⁸ See letter dated June 29, 2006 from Sean Gallagher to parties in R.06-05-027 extending the 2006 solicitation schedule.

report on a more advanced schedule, consistent with the schedule adopted for the work in this portion of R.06-05-027. (See Attachment B.) This is similarly true for all LSEs subject to the RPS program and R.06-05-027 (e.g., who may be subject to the later decision here based on comments and reply comments, and later may be filing 2007 RPS plans).

The first report may be limited to explaining “each utility’s evaluation and selection model [and] its process...” and may be preliminary, if necessary. (D.06-05-039, p. 44.) It may be improved when filed with the 2006 short list. That is, for example, the report with the 2006 short list may contain more complete information regarding actual bid submission and evaluation.⁹ Nonetheless, at least a preliminary report will provide respondents and parties information which may be useful for the comments and reply comments sought here. As required by the Commission, the “utilities should make their evaluation process transparent...” (D.06-05-039, p. 44, citing D.05-07-039, p. 7.) To the extent helpful, respondents may refer to Commission direction regarding elements for such report. (D.06-05-039, pp. 44-46.) The report should be filed and served on the date shown in Attachment B.

(END OF ATTACHMENT A)

⁹ “The report shall explain each utility’s...decision rationale with respect to each bid, both selected and rejected.” (D.06-05-039, p. 44.)

ATTACHMENT B

**SCHEDULE FOR COMMENTS ON ISSUES
R.06-05-027**

Item	Date
Scoping Memo with issues for comment	8/21/06
LSEs report on evaluation criteria and selection process	9/22/06
Comments	10/6/06
Possible Energy Division facilitated Workshop [1]	TBD
Reply comments	10/27/06
Motion for hearing [2]	11/1/06
Projected submission date (assumes no hearing)	11/1/06
Replies to motion for hearing	11/6/06
Draft Decision (DD)	TBD
Motions for Final Oral Argument (FOA - 20 days after DD filed)	
Comments on DD (20 days after DD)	
Replies to motions for FOA (2 days after motions)	
Reply Comments on PD (5 days after comments)	
FOA	
Commission decision adopted and mailed	

[1] Date to be set by Energy Division

[2] If motion made and granted, a revised schedule will be issued.

TBD = To be determined

(END OF ATTACHMENT B)

ATTACHMENT C
DRAFT 2007 RPS PROCUREMENT PLANS
R.06-05-027

Each renewables portfolio standard (RPS) obligated load serving entity (LSE) respondent shall file and serve a draft 2007 Renewables Portfolio Standard (RPS) Procurement Plan by the date stated in Attachment D. Each Plan shall be in the form and format which the LSE seeks to be adopted by the Commission. LSEs are encouraged to use the same form and format. Each Plan shall be consistent with requirements of the Public Utilities Code and Commission decisions including, but not limited to, the following:

“Consistent with the goal of procuring the least-cost and best-fit eligible renewable energy resources, the renewable energy procurement plan submitted by an electrical corporation shall include, but is not limited to, all of the following:

- (A) An assessment of annual or multiyear portfolio supplies and demand to determine the optimal mix of renewable generation resources with deliverability characteristics that may include peaking, dispatchable, baseload, firm, and as-available capacity.
- (B) Provisions for employing available compliance flexibility mechanisms established by the commission.
- (C) A bid solicitation setting forth the need for renewable generation of each deliverability characteristic, required online dates, and locational preferences, if any.” (Pub. Util. Code § 399.14(a)(3).)

Each RPS Procurement Plan shall also state all that is reasonable necessary to present a complete Plan. This shall include, but is not limited to:

1. A statement for each year from 2004 through 2010 (with estimates as needed or appropriate) of:
 - 1.1 Actual and/or forecast retail sales,
 - 1.2 Baseline procurement and baseline procurement target,
 - 1.3 Actual annual procurement and annual procurement target,
 - 1.4 Actual increment procurement and incremental procurement target, and
 - 1.5 Any other relevant targets.
2. Identification of lessons learned over the last few years' experience with the RPS program which lead to recommended changes for the 2007 procurement plan or cycle.
3. Statement of specific considerations, if any, in the Plan relative to:
 - 3.1 transmission,
 - 3.2 experience with RPS generators willingness to propose or consider curtailability to facilitate acceptable bids or products, and
 - 3.3 experience with expanding deliverability from only the CAISO control area to anywhere in California
4. A showing on each LSE's workplan to reach 20% by 2010, including but not limited to:
 - 4.1 identification of any impediments that remain to reaching 20% by 2010,
 - 4.2 what the LSE is doing to address those impediments, if anything.
5. A showing on the LSE's current consideration of whether or not to build its own renewable generation to reach 20% by 2010 (D.06-05-039, pp. 33-34).

6. A statement summarizing the changes in the 2007 Plan from the 2006 Plan.
7. Anything else necessary for a full and complete presentation of its 2007 RPS Procurement Plan for the Commission's consideration, as recommended by the LSE for Commission adoption.

(END OF ATTACHMENT C)

ATTACHMENT D**SCHEDULE FOR 2007 RPS PLANS
R.06-05-027**

Item	Date
Electrical corporations file and serve draft 2007 RPS Plans	9/18/06
Electrical corporations send letters to prospective developers requesting information for TRCRs	9/25/06
Comments filed and served on draft 2007 RPS Plans	10/9/06
Reply comments filed and served on 2007 RPS Plans	10/16/06
Motion for hearing filed and served [1]	10/19/06
Projected submission date (if no motion for hearing)	10/19/06
Responses to motion for hearing filed and served	10/24/06
Draft TRCRs filed and served	11/1/06
Comments filed and served on draft TRCRs	11/15/06
Reply Comments filed and served on draft TRCRs	11/22/06
Draft Decision (DD) on 2007 Plans	TBD
ACR on TRCRs	
Motions for Final Oral Argument (FOA – 20 days after DD)	
Comments on DD (20 days after DD filed)	
Replies to motions for FOA (2 days after motions)	
Reply Comments on DD (5 days after comments)	
FOA	
Commission decision on 2007 Plans	
Electrical corporations issue RFOs for 2007 Solicitation	

[1] If motion made and granted, a revised schedule will be issued.

TBD = To be determined

(END OF ATTACHMENT D)

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 August 21, 2006, at San Francisco, California.

/s/ ELIZABETH LEWIS
Elizabeth Lewis

***** SERVICE LIST *****

Last Update on 03-AUG-2006 by: LIL
R0605027 LIST

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