

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



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Application of Pacific Gas and Electric
Company to Implement and Recover in Rates
the Costs of its Photovoltaic (PV) Program

(U 39 E)

Application 09-02-019

(Filed February 24, 2009)

**PACIFIC GAS AND ELECTRIC COMPANY'S (U 39-E)
OPENING BRIEF ON THE IMPACT OF SENATE BILL 32 AND
ASSEMBLY BILL 920**

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November 10, 2009

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I. INTRODUCTION

Pacific Gas and Electric Company ("PG&E") submits this brief in response to the Administrative Law Judge's ("ALJ") Ruling served on October 30, 2009, in which the ALJ requested briefs on whether Senate Bill ("SB") 32^{1/} or Assembly Bill ("AB") 920^{2/} impact PG&E's proposed Photovoltaic ("PV") Program in any material way.^{3/} PG&E submits that neither SB 32 nor AB 920 has any material impact on the California Public Utility Commission's ("Commission") decision in the present proceeding, for the reasons discussed in more detail below. The potentially overlapping issues raised by these new statutes are not materially different than the issues already addressed in the record of this proceeding.

SB 32 directs the Commission to consider increasing the maximum size of generation facilities eligible for the existing feed-in tariff ("FIT") from 1.5 megawatts ("MW") to 3 MW^{4/} and raises the program's statewide cap from 500 MW to 750 MW.^{5/} The price of energy delivered under the expanded FIT will be the Market Price Referent ("MPR"), including all

^{1/} Stats. 2009, ch. 328.

^{2/} Stats. 2009, ch. 376.

^{3/} ALJ's Ruling Requesting Briefs on the Impact of SB 32 and AB 920 ("ALJ's Ruling") at p. 2 (October 30, 2009).

^{4/} Pub. Util. Code § 399.20(b)(1); 399.20(j)(2).

^{5/} *Id.* at § 399.20(f).

current and anticipated environmental compliance costs, which may be adjusted on a time-of-delivery basis.^{6/}

AB 920 allows certain customers who have installed solar, wind, or solar/wind hybrid systems with a capacity of 1 MW or less on their own premises to offset part or all of the customer's own load to receive a credit for net surplus energy that the customer generates over a 12-month period.^{7/} The price paid for the net surplus energy will be determined by the Commission based on its determination of what is "just and reasonable" and leaves other ratepayers unaffected or indifferent.^{8/}

The ALJ's Ruling asked parties to address whether the price, the MW capacity of individual projects, and the structure offered under these statutes^{9/} may impact the proposed PV Program and, if so, whether these impacts are material enough to affect the Commission's decision on the PV Program.^{10/}

II. SB 32 DOES NOT MATERIALLY IMPACT THE PV PROGRAM

The potential expansion of the FIT program from 1.5 MW to 3 MW does not materially impact the proposed PV Program because: (1) the parties have already had an opportunity to address the overlap of the two programs; (2) the facilities targeted by the PV Program are unlikely to participate in the FIT; and (3) it is unlikely that SB 32 will be implemented on the same schedule as the PV Program.

First, the existing FIT with a size cap of 1.5 MW has been in place since PG&E proposed the PV Program in February 2009. In fact, PG&E noted the existence of the 1.5 MW FIT in its opening testimony and stated that the PV Program is designed to complement, rather than

^{6/} *Id.* at § 399.20(d).

^{7/} *See* Pub. Util. Code §§ 2827(b)(4), (b)(6), (c)(1), (h)(3).

^{8/} *Id.* at § 2927(h)(4)(A).

^{9/} Because the ALJ's Ruling specifically notes that SB 32 and AB 920 will be implemented in other proceedings (ALJ Ruling at p. 2, n.2), PG&E's brief addresses only whether these statutes can reasonably be expected to materially impact the PV Program proposal, and PG&E accordingly reserves its comments on the implementation of SB 32 and AB 920 for future proceedings.

^{10/} *See* ALJ Ruling at p. 2.

compete, with the FIT.^{11/} There was very little, if any, concern raised by the parties regarding the potential overlap between the existing FIT and the PV Program, and for good reason: The price of the existing FIT is limited to the MPR (currently about \$111/MWh for a baseload, 20-year contract^{12/}), which is less than half of the \$246/MWh that the record of this proceeding shows it will cost to develop qualifying mid-sized PV installations. In short, there is no practical overlap between the FIT and PV Program because mid-sized PV installations would likely not be built at the price offered by the existing FIT. Past experience bears out this presumption, since the FIT has not led to the development of any mid-sized PV in PG&E's service territory.^{13/}

Second, SB 32 allows the FIT to be expanded to a maximum capacity of 3 MW, but it is unlikely to materially increase the price offered for the energy. The price paid for energy under SB 32 will be the MPR including "all current and anticipated environmental compliance costs, including, but not limited to, mitigation of emissions of greenhouse gases and air pollution offsets"^{14/} The MPR is generated from the total installed capital costs of a combined-cycle gas-fired generation facility,^{15/} and therefore already captures the full costs of development of the reference proxy plants, including presumably air pollution offsets that would be required for development. Additionally, the most recent MPR values already include the anticipated costs of compliance with likely GHG regulatory regimes.^{16/} Accordingly, it is possible that the price offered under SB 32 for FIT contracts will be no higher than prices offered under the existing FIT, and in any case the price is unlikely to be significantly higher. As noted above, this pricing makes it highly unlikely that the SB 32 FIT will attract investment in mid-sized PV over the 5-year period of the PV Program.

^{11/} See Exhibit ("Exh.") 1, Testimony of Fong Wan, at p. 1-7, lines 21-14.

^{12/} Commission Resolution ("R.") E-4214, at p. 1 (December 18, 2008).

^{13/} See PG&E's Existing Executed Feed-In Tariff Contracts (available at <http://www.pge.com/b2b/energysupply/wholesaleelectricssolicitation/standardcontractsforpurchase/>) (last updated in October 2009).

^{14/} Cal. Pub. Util. Code § 399.20(d)(1).

^{15/} R. E-4214 at p. 16.

^{16/} See *id.*, at pp. 14-15.

Third, it is uncertain when SB 32 will be implemented. SB 32 contains no definitive timeline for implementation, and, given the other numerous pressing RPS matters pending at the Commission, it may be some time before the SB 32 program is fully implemented. If the PV Program is approved in February, consistent with the current schedule, PG&E intends to issue its first Request for Offers (“RFO”) in mid-2010, which is likely to be before the SB 32 program is fully implemented.

III. AB 920 DOES NOT MATERIALLY IMPACT THE PV PROGRAM

The principal change enacted by AB 920 is to allow California Solar Initiative (“CSI”) net-metered customers to receive compensation for any net surplus energy they generate. AB 920 does not change the existing CSI size cap of 1 MW or less.^{17/} Accordingly, there is no overlap with the power purchase agreement component of the PV Program.^{18/} Although PG&E has reserved the option in its proposal for utility-owned generation under the PV Program to develop projects less than 1 MW, these projects, if any, would not be a significant portion of the total and would only be built where the projects complement rather than compete with the CSI program.^{19/} The potential for competition between CSI and the PV Program has been significantly litigated in this proceeding, and nothing in AB 920 materially impacts the arguments already made by parties. It is worth noting that although CSI customers will be able to receive compensation for net surplus energy, they are still required to size their installations to offset their own load.^{20/} This requirement, in combination with the 1 MW CSI cap, minimizes the potential that a customer would see CSI as a viable wholesale generation opportunity competing with the PV Program.

^{17/} Cal. Pub. Util. Code § 2827(b)(4).

^{18/} See Exh. 1, at p. 3-3, lines 14-15.

^{19/} See Exh. 1, at p. 2-2, lines 24-25.

^{20/} Cal. Pub. Util. Code § 2827(b)(4).

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL OR U.S. MAIL

I, the undersigned, state that I am a citizen of the United States and am employed in the City and County of San Francisco; that I am over the age of eighteen (18) years and not a party to the within cause; and that my business address is Pacific Gas and Electric Company, Law Department B30A, 77 Beale Street, San Francisco, CA 94105.

I am readily familiar with the business practice of Pacific Gas and Electric Company for collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, correspondence is deposited with the United States Postal Service the same day it is submitted for mailing.

On the 10th day of November 2009, I served a true copy of:

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OPENING BRIEF ON THE IMPACT OF SENATE BILL 32
AND ASSEMBLY BILL 920**

[XX] By Electronic Mail – serving the enclosed via e-mail transmission to each of the parties listed on the official service list for A.09-02-019 with an e-mail address.

[XX] By U.S. Mail – by placing the enclosed for collection and mailing, in the course of ordinary business practice, with other correspondence of Pacific Gas and Electric Company, enclosed in a sealed envelope, with postage fully prepaid, addressed to those parties listed on the official service lists for A.09-02-019 without an e-mail address.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 10th day of November, 2009 at San Francisco, California.

/s/

AMY S. YU

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