



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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**SIERRA CLUB CALIFORNIA'S OPENING BRIEF ON
IMPLEMENTATION OF SENATE BILL 32**

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SIERRA CLUB CALIFORNIA'S OPENING BRIEF ON IMPLEMENTATION OF SENATE BILL 32

Sierra Club California respectfully submits the following in response to the ADMINISTRATIVE LAW JUDGE'S RULING SETTING SCHEDULE FOR BRIEFS ON IMPLEMENTATION OF SENATE BILL 32 filed 1/27/11.

Sierra Club California is comprised of more than 200,000 members and ratepayers throughout California who are committed to reducing the state's carbon emissions and accelerating the adoption of renewable energy sources. The Club broadly supports implementation of effective feed-in tariffs that can help meet the state's targets for renewable energy.

The principle concerns regarding SB 32 are that:

- a) Effective prices should be established that stimulate broad growth of Renewable Distributed Generation
- b) Project caps should be increased to 20 megawatts
- c) California should develop much more distributed generation than the targets set by SB 32.

I. PROGRAM DESIGN RECOMMENDATIONS

1. Customers and eligibility

- **Elimination of separate tariffs for (a) water/wastewater and (b) other customers;**
Sierra Club California would like to see tariffs established for each type of Renewable Distributed Generation (RDG) resource, thus a separate tariff should be retained for water/wastewater from other customers to the extent that this technology has unique cost factors. Making a one size fits all tariff risks overpaying for some technologies and underpaying for others. Underpaying will tend to choke off growth in important market sectors that increase available RDG potential. A one size fits all price could also undermine development of diverse resources which could otherwise offer a number of system benefits.

- **Elimination of "retail customer" requirement; and**

We strongly support eliminating any retail customer requirement for ownership or siting of RDG projects. Removing this limitation opens up much broader options and flexibility for many aspects of RDG projects. The retail customer limitation is built upon a package of concepts belonging to on-site generation and net metering. One of the major benefits of feed-in tariffs is that they break down the numerous development barriers and constraints created by the on-site rule and net metering. Almost any facet of attachment to “retail customers” is bound to create unnecessary constraints. If only retail customers can own facilities, then this ties the hands of potential commercial talent. If only retail customer sites can be used, then this limits the possibility of siting projects at locations that have better renewable resources or other superior characteristics than a particular retail customer might possess.

- **Tariff language regarding eligible facility requirements.**

No Comment

2. Increase in size of eligible facility to three MW:

1. Commission’s discretion to reduce three MW capacity limit to maintain system reliability.

“(2) The commission may reduce the three megawatt capacity limitation of paragraph (1) of subdivision (b) if the commission finds that a reduced capacity limitation is necessary to maintain system reliability within that electrical corporation's service territory.”

While SB 32 grants the commission discretion to reduce 3 MW capacity limit to maintain system reliability, we believe that there is no need to make a wholesale reduction in the project size for an electrical corporation’s entire service territory. In its recent ruling resulting in the new RAM program, the commission has appropriately allowed project sizes of up to 20 MW and found no general problem with adopting this upper limit. The retail seller already has authority to decline an application for an individual project where

the distribution grid does not have sufficient capacity. However, even in this situation, the electrical corporation should have some obligation to make reasonable upgrades to its distribution grid where an increase in its capacity could support beneficial new projects under this and other similar programs.

3. Utility reporting requirements.

Please see comments in response to question #12 below.

4. Adjustment of program cap and allocation to 750 MW.

Sierra Club California would support increasing the IOU program cap to 750 MW from the current 500 MW share in SB 32. Furthermore, if this program results in tariff payments sufficient to cover a generator's total costs and allow a reasonable profit, and can be successful in stimulating the growth of renewable energy, then we urge the commission to consider increasing the program cap to well beyond 750 MW. If this program is well designed, it could help support the Governor's proposed goal 12,000 MW of distributed generation renewable energy by 2020, a goal which Sierra Club supports.

1. Identification of basis for determining statewide electrical capacity and utilities' shares. A list of investor-owned utilities and publicly owned utilities is attached as Attachment A.

Program capacity allocated either based upon share of electricity sales or upon utility peak load would be acceptable.

5. Yearly inspection and maintenance report.

“p) In order to ensure the safety and reliability of electric generation facilities, the owner of an electric generation facility receiving a tariff pursuant to this section shall provide an inspection and maintenance report to the electrical corporation at least once every other year. The inspection and maintenance report shall be prepared at the owner's or operator's expense by a California licensed contractor who is not the owner or operator of the electric generation facility. A California licensed electrician shall perform the inspection of the electrical portion of the generation facility.”

“j) (1) The commission shall establish performance standards for any electric generation facility that has a capacity greater than one megawatt to ensure that those facilities are constructed, operated, and maintained to generate the expected annual net production of electricity and do not impact system reliability.”

The annual inspection requirement seems reasonable for projects exceeding 1 MW but may pose an unreasonable burden on smaller projects. This requirement could discourage residential or small to mid-size commercial systems from applying for a tariff. The market for commercial solar projects below 1 MW is currently at risk in California due to depletion of CSI funds. Various options should be considered in this feed-in tariff program to support the continued functioning of the sub-1 MW solar market.

Regarding the performance standard, under this program generators are only paid for electricity they generate. If they don't produce, they don't get paid and the impact of smaller projects that fail to produce is likely to be modest. In fact this is one of the advantages of multiple, smaller distributed projects – the impact of the failure of any one project has minimal impact on meeting power needs, and the probability of multiple projects failing simultaneously should be quite small, especially as the number of RDG projects increases.

6. New contract provisions.

No comment.

7. Utility discretion to deny tariff, subject to appeal to the Commission.

We believe that utilities should not be allowed to deny the tariff on any other ground than failure of the project to meet the objective standards approved by the commission, and whether the project can reasonably and safely connect to the distribution grid. This should not be a matter of discretion; only of fact. The intent of this legislation is to promote renewable distributed generation (RDG) as a strategy to help the state achieve its RPS targets. In order to accommodate these new generation projects, it is in the interest of

ratepayers and the state that electrical corporations upgrade their distribution grids to accommodate more RDG in priority areas such as industrial parks where existing DG grids and substation transformers may not have sufficient reserve capacity. Just as utilities build and pay for approved new transmission to support large scale projects to benefit their customers, they should upgrade their distribution grids in order to support distributed generation.

In summary, the commission should generally require utilities to cooperate with developers, facilitate implementation of this program, and not become a barrier to its success. Utilities should be constrained to making decisions based upon objective criteria rather than discretion, and the commission should enforce this requirement. Developers should have the right of appeal to the commission if they are denied, or to resolve other conflicts, and should be encouraged to report any problems to the commission.

8. Contract termination provisions.

No comment.

9. Performance standards to be established by the Commission.

No comment.

10. Commission discretion to make adjustments for small utilities.

The commission should have this discretion to adjust requirements according to the reasonable limitations faced by small utilities.

11. Setting the tariff price

1. Price calculation and

3. Relevance, if any, of FERC Order Granting Clarification and Dismissing Rehearing, 33 FERC ¶ 61,059 (October 21, 2010) and FERC Order Denying Rehearing, 134 FERC ¶ 61,044 (January 20, 2011), to setting the tariff price.

Two key components of the expressed intent of SB 32 are to

1. Create a pricing structure that removes the present “barriers” to meeting state RPS goals.

“(b) Some tariff structures and regulatory structures are presenting a barrier to meeting the requirements and goals of the California Renewables Portfolio Standard Program (Section 387 of, and Article 16 (commencing with Section 399.11) of Chapter 2.3 of Part 1 of Division 1 of, the Public Utilities Code).”

2. Fairly compensate renewables for their full economic value to “accelerate their deployment”.

“(e) A tariff for electricity generated by renewable technologies should recognize the environmental attributes of the renewable technology, the characteristics that contribute to peak electricity demand reduction, reduced transmission congestion, avoided transmission and distribution improvements, and in a manner that accelerates the deployment of renewable energy resources.”

Under SB 32, the CPUC will need to calculate tariffs for each type of eligible renewable energy resource based on the market price established by the commission added to each resources’ unique attributes with respect to its total anticipated environmental benefits and adjusted by time-of-delivery values.

“The payment shall be the market price determined by the commission pursuant to Section 399.15 and shall include all current and anticipated environmental compliance costs, including, but not limited to, mitigation of emissions of greenhouse gases and air pollution offsets associated with the operation of new generating facilities in the local air pollution control or air quality management district where the electric generation facility is located.”

(2) The commission may adjust the payment rate to reflect the value of every kilowatt hour of electricity generated on a time-of-delivery basis.

We argue that a broad pricing authority is granted to the commission by AB 32, first through the legislative intent cited above, then in the pricing section of AB 32 through reference to the authority of the commission to “determine” the market price, to “include” various environmental costs, and to “adjust” the tariff rates, as well as the general state constitutional authority of the commission to set rates. Thus, we believe that the feed-in tariff pricing authority of the commission should be interpreted broadly for the purpose of achieving the legislative intent of SB 32—to develop a tariff structure that removes barriers to renewable energy, and to accelerate the deployment of renewable energy.

Under the recent FERC rulings cited above, the CPUC may set benchmark tariffs based upon the avoided cost of competing projects within a category of generation. This becomes the contextual definition of “avoided cost” provided that there is a requirement for utilities to procure specific types of energy resources. Under the provisions of this bill, each electrical corporation and publically owned utility would be responsible for accepting qualified applicants on a first- come-first-served basis until that retail seller filled its quota as defined by its proportionate share of peak demand to 750 MW of total capacity.

Sierra Club California strongly advocates for a cost-based feed-in tariff that supports diverse technologies and project sizes as a tariff pricing structure that is well proven to remove barriers and accelerate deployment of renewable energy. We recommend that the commission establish tariffs for each eligible renewable energy resource, further differentiated by project size, and for wind, by resource intensity. Tariffs should be set for each category based upon capacity targets for each technology and project size, in order to conform with the FERC ruling. A broad market, with a full range of project sizes from 1 kilowatt to 20 megawatts should be served.

We request that the commission remain open in the future to comment and possible modification to feed-in tariff pricing should SB 1X 2 or other legislation make changes to the pricing requirements contained in SB 32.

3. Customer indifference

Sierra Club urges the commission not to allow the concept of customer indifference to be used to impose yet more IOU energy procurements costs on community choice aggregation customers. Renewable energy is a benefit to IOUs and IOU customers, in helping to stabilize rates, lowering environmental impact and risk, and reducing exposure to compliance penalties. Departing load reduces proportionally the amount of renewable energy a given IOU needs to procure. And at the time the load departs, this automatically increases the percentage of renewables in the IOUs portfolio without additional cost or any new procurement of actual renewable supply.

12. Expedited interconnection procedures.

Sierra Club strongly supports efforts to rationalize and expedite the interconnection process. This has long been recognized as one of the major barriers to distributed generation. The commission should investigate utility practices that achieve rapid interconnection, and require the electrical corporations to implement them. If more staff is required to process large volumes of requests, then the commission should work with the utilities to insure adequate staff and other resources are devoted to this process.

13. Commission consideration of locational benefits

The commission should definitely examine the value of locational benefits, and it would be desirable for valuation elements to be integrated into the RAM mapping process for use beyond the RAM program, such as in the SB 32 feed-in tariff. One of the principle problems with establishing the value of distributed generation is that many of the value elements are not well quantified. This is an excellent opportunity to do this quantification.

14. Refunds of incentives pursuant to the California Solar Initiative and the Self-Generation Incentive Program

We strongly recommend that projects receiving CSI funds not be permitted to participate in the feed-in tariff or RPS program. This is because the AB 32 Scoping Plan assigned to the California Solar Initiative a specific amount of carbon reduction which is independent of the carbon reductions expected from the RPS program. Blending or “co-mingling” these two programs directly undermines the ability of key state programs to achieve the carbon reduction targets assigned to them. Thus, if a project developer wishes to participate in the feed-in tariff program, they should be required to directly forfeit their rebate back to the CSI program.

With respect to the more general question about incentives from other programs, that will depend on the methodology used to derive the price for the tariffs. If the prices are set on a cost plus profit basis, then the tariff should be adjusted according to the incentive received. If the tariff is set on a “market price” basis then we believe that the developers should be allowed to retain the benefit of whatever subsidies they are able to obtain, especially since it can be quite challenging for small renewable generators to match market prices based on large conventional generators. They should be allowed in this circumstance to take all the help that they can get.

II. CONCLUSION

Sierra Club California appreciates the opportunity to file this Opening Brief on the Implementation of Senate Bill 32 and looks forward to assisting the Commission in designing a successful feed-in-tariff program.

Dated: March 7, 2011

Respectfully Submitted,

/s/ Jim Metropulos

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VERIFICATION

I am the Senior Advocate with Sierra Club California and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing pleading are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7th day of March, 2011, at Sacramento, California.

/s/ Jim Metropulos

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CERTIFICATION OF SERVICE
R0808009

I, Jim Metropulos, certify that on this day March 7, 2011, I sent copies of the attached SIERRA CLUB CALIFORNIA'S OPENING BRIEF ON IMPLEMENTATION OF SENATE BILL 32 to be served on all parties by emailing a copy to all parties identified on the electronic service list provided by the California Public Utilities Commission for this proceeding, and also by efilng to the CPUC Docket office, with a paper copy to Administrative Law Judge Burton W. Mattson, and Presiding Commissioner Michael Peevey.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on March 7, 2011, at Sacramento, California.

Executed on March 7, 2011 at Sacramento, California.

/s/ Jim Metropulos

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Service List

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