



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 (U39E) )

Application 09-02-019  
(Filed February 24, 2009)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS TO  
PROPOSED DECISION ADOPTING A SOLAR PHOTOVOLTAIC PROGRAM FOR  
PACIFIC GAS AND ELECTRIC COMPANY (U39E)**

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Dated: **February 16, 2010**

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**I.**

**INTRODUCTION**

Pursuant to Rule 14.3 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby submits its Opening Comments on the Proposed Decision of Administrative Law Judge (ALJ) Maryam Ebke dated January 26, 2010, adopting Pacific Gas and Electric Company's (PG&E) Solar Photovoltaic Program (PV Program) (Proposed Decision).

**II.**

**INTRODUCTION**

SCE generally supports the Proposed Decision's adoption of PG&E's PV Program to develop up to 500 megawatts (MW) of solar photovoltaic (PV) facilities,<sup>1</sup> but requests the

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<sup>1</sup> Proposed Decision, p. 2; *id.*, Ordering Paragraph Nos. 1-2, p. 61; *id.*, Appendix A (describing the adopted PV Program).

modification proposed in the instant comments. The Proposed Decision's<sup>2</sup> current cost recovery framework for utility owned generation (UOG) PV facilities unreasonably caps UOG costs based upon independent power producer (IPP) bids selected in the competitive solicitation portion of PG&E's PV Program.<sup>3</sup> Consistent with the regulatory standard for recovery of UOG costs, SCE urges the Commission to adopt traditional cost of service ratemaking for the UOG portion of the PV Program. In the alternative, SCE urges the Commission to clarify that the final decision in this proceeding applies to PG&E's PV Program only and has no other precedential value.

### III.

#### **TRADITIONAL COST OF SERVICE RATEMAKING IS APPROPRIATE FOR UTILITY OWNED GENERATION**

Traditional cost of service ratemaking is appropriate for UOG projects in general because capital expenditures are subject to a combination of pre-approval and reasonableness reviews to ensure that a utility properly installs, maintains, and operates a UOG facility. In accordance with the traditional regulatory structure, PG&E's application proposes traditional cost of service ratemaking based on a per-MW cost target.<sup>4</sup> In particular, if actual capital costs are at or below the average target at the end of the five year PV Program period, PG&E requests that it be allowed to recover the actual capital costs without any further reasonableness review.<sup>5</sup> PG&E would only be authorized to recover revenue requirements for the PV UOG Program in excess of its proposed capital cost target upon a Commission determination that the costs in excess of the cap were reasonably incurred.<sup>6</sup>

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<sup>2</sup> Filed concurrently with these Comments to the Proposed Decision, SCE submits Comments to the Alternate Proposed Decision of President Michael R. Peevey (Alternate Proposed Decision). SCE's Comments to the Alternate Proposed Decision make the same argument to a similar ratemaking ruling. *See* SCE Comments to the Alternate Proposed Decision.

<sup>3</sup> *See* Proposed Decision, p. 43 ("Because the amount PG&E will be able to recover for UOG projects is expressly tied to the price from the PPA solicitations, this cap will in effect act as a cap for the maximum cost ratepayers would bear for UOG projects as well.")

<sup>4</sup> *See* PG&E Application for a PV Program, pp. 7-8.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

In accordance with previous Commission decisions dealing with UOG cost recovery, the cost of service ratemaking proposed by PG&E for its UOG PV facilities provides for:

Commission oversight of the cost of owning and operating the facility, and provides the utility with the opportunity to recover any costs the Commission finds reasonable. Traditional cost of service ratemaking is intended to balance the risks and rewards of new UOG between customers and utility shareholders, and has been used in a wide range of situations. In an application for approval of UOG, the utility could propose cost of service ratemaking for a specific facility where this kind of ratemaking would be beneficial for customers and the utility.<sup>7</sup>

In SCE's Application for Authority to Implement and Recover in Rates the Cost of its Proposed Solar Photovoltaic Program (SCE's Application), SCE proposed a cost recovery mechanism for its proposed UOG PV facilities that is similar to that proposed by PG&E.<sup>8</sup> The Commission recognized the proposal's value to ratepayers, ruling in the Decision approving SCE's Program,<sup>9</sup> that "[t]he UOG portion of the [SCE's Solar PV Program] should be subject to cost of service regulation."<sup>10</sup> In supporting the traditional cost of service framework, the Commission recognized its own "ongoing duty to ensure that utility investments result in infrastructure that is used and useful. In the context of [UOG], [the Commission has] long-standing policies and procedures in place under which utility projects are reviewed to make sure that approved investments are being made in a reasonable manner and that the resulting facilities actually fulfill their stated purpose."<sup>11</sup>

While intervenor parties proposed various alternative methods of cost recovery in SCE's Solar PV Program proceeding, the Commission "[saw] no compelling reason why in the context

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<sup>7</sup> See, e.g., Decision (D.) 07-12-052, p. 219 (2006 Long-Term Procurement Plan (LTPP) proceeding).

<sup>8</sup> See A.08-03-015, pp. 48-59.

<sup>9</sup> See D.09-04-049 (Decision approving SCE's Solar Photovoltaic Program).

<sup>10</sup> *Id.*, Conclusion of Law No. 8, p. 57.

<sup>11</sup> *Id.*, pp. 47-48.

of [SCE's Solar PV Program] [it] should stray from this existing [ratemaking] process."<sup>12</sup> The same reasoning applies to PG&E's PV Program. The parties to the instant proceeding have not demonstrated that traditional cost of service ratemaking for the UOG portion of PG&E's PV Program is insufficient to protect ratepayer interests.

#### IV.

#### **IN THE ALTERNATIVE, THE COMMISSION SHOULD EXPLICITLY STATE THAT ITS RULING IS NOT PRECEDENTIAL**

Alternatively, SCE asks that the Commission make clear that the cost recovery mechanism imposed in the Proposed Decision is limited to PG&E's PV Program and does not set a precedent for any other UOG project. In this regard, the Decision on SCE's Solar Photovoltaic Program contained the following clarifying language:

In approving both a UOG program and an IPP program, we are addressing solely the proposals before us in this proceeding and are not establishing a precedent for other possible UOG or IPP renewable programs. Nor are we establishing modifications to the rules specified in other proceedings regarding the development and acquisition of resources, whether conventional or renewable.<sup>13</sup>

The same or similar language should be included by the Commission in any final decision approving PG&E's PV Program.

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<sup>12</sup> D.09-04-049, p. 48.

<sup>13</sup> *Id.*, p. 40.

V.

**CONCLUSION**

SCE respectfully requests the Commission to modify the Proposed Decision as recommended above and in Attachment A.

Respectfully submitted,

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February 16, 2010

## Attachment A

SCE requests that Appendix A to the Proposed Decision (describing PG&E's PV Program) be revised as follows:

Appendix A, page 1

Price: ~~The weighted average price of winning bids from PG&E's most recent solicitation for PPA portion of the PV Program.~~ **The UOG portion of the PV Program should be subject to cost of service regulation.**

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the Commissioner's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U338-E) COMMENTS TO PROPOSED DECISION ADOPTING A SOLAR PHOTOVOLTAIC PROGRAM FOR PACIFIC GAS AND ELECTRIC COMPANY (U39E) on all parties identified in the attached service list(s).

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **16th day of February, 2010**, at Rosemead, California.

/s/ Melissa Schary  
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ROOM 5031  
505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3214

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