

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



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Order Instituting Rulemaking to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program.

Rulemaking 06-02-012
(Filed February 16, 2006)

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

Rulemaking 08-08-009
(Filed August 21, 2008)

**POST WORKSHOP COMMENTS OF
THE ROYAL BANK OF SCOTLAND PLC**

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April 30, 2010

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

Order Instituting Rulemaking to Develop
Additional Methods to Implement the California
Renewables Portfolio Standard Program.

R.06-02-012

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

Rulemaking 08-08-009
(Filed August 21, 2008)

**POST WORKSHOP COMMENTS OF
THE ROYAL BANK OF SCOTLAND PLC**

The Royal Bank of Scotland plc (“RBS”) appreciates the opportunity to offer comments following the April 23, 2010 workshop (the “Workshop”) on the use of Tradable Renewable Energy Credits (TRECs) for Renewable Portfolio Standard (“RPS”) compliance. RBS has a fifty one percent (51%) ownership interest in Sempra Energy Trading LLC and Sempra Energy Solutions LLC (jointly “RBS Sempra Commodities”). RBS Sempra Commodities is authorized to sell energy, capacity, and ancillary services at market-based rates and transacts within all the Regional Transmission Organizations, including the California Independent System Operator (“CAISO”).

I. INTRODUCTION

A key issue that was explored at the Workshop was whether RPS contracts involving renewable energy facilities that are not directly interconnected to a California Balancing Authority Area (“CBAA”) should be considered bundled or REC-only transactions. This issue is particularly significant as REC-only transactions are subject to an interim cap while bundled transactions are not. While the focus at the Workshop was on transactions that utilize a firm

transmission path to a CBAA and under what conditions such transactions might qualify as bundled transactions, RBS believes a simpler approach is available to determine which transactions are bundled and which transactions are REC-only.

The only transactions that should be considered 'REC-only' transactions are those that (as the name implies) involve RECs only. Transactions that involve delivery of energy and RECs should be considered bundled transactions. As illustrated in the Table below, bundled transactions can differ in terms of where balancing and firming services are procured, whether transmission from the RPS eligible facility to a CBAA is required and whether there is some level of substitution by system energy. However, they are still bundled transactions that fix the price of energy and RECs and differ from REC-only transactions.

Type of transaction	Fixes price of power and REC?	Requires firm transmission from given RPS eligible facility to a CBAA?	Includes cost of balancing services procured outside a CBAA?	Involves substitution of system energy	Previously available without a cap?	Proposed Classification
Dynamically scheduled imports using firm transmission from RPS eligible facilities outside CA	Yes	Yes	No	No	No	Bundled
Non-dynamically scheduled imports using firm transmission from RPS eligible facilities outside CA	Yes	Yes	Yes	Yes	Yes	Bundled

‘Firming and shaping’ transactions	Yes	No	Yes	Yes	Yes	Bundled
REC-only transactions	No	NA	NA	NA	No	REC-only

If necessary, the definition of bundled transactions may be further refined (as was suggested by some at the workshop) to require incremental energy delivery to the purchaser.

II. RESPONSES TO QUESTIONS

1. How may the North American Electric Reliability Corporation (NERC) e-tag protocols be used to verify that RPS-eligible generation has been delivered to California? Please address firm transmission arrangements, dynamic transfer arrangements, and firming/shaping arrangements.

The premise of this question is that e-tags can verify that RPS eligible generation has been delivered to California. This may not be an accurate assumption in an interconnected electrical grid where it is impossible to separate renewable power from other power. At best, e-tags that point to an RPS eligible generation resource with a contiguous transmission path to California can indicate that power flows contractually from that renewable facility to California. Even in this instance, given the fixed hourly schedule and the variable output of the facility, some level of system energy that cannot be attributed to a particular RPS eligible generation resource will be substituted for delivery. However, such substitution by system energy should not disqualify a contract from being considered a bundled transaction as long as the renewable energy output is verifiable and displaces energy from conventional energy resources in the Western Interconnection.

2. What, if any, are the implications for ratepayers and for the administration of the RPS program of defining a California balancing authority area as that of a balancing authority located primarily in California (as set out in the pre-workshop comments of Pacific Gas and Electric Company, Iberdrola Renewables, and Shell Energy North America), rather than as a balancing authority having substations in California (as set out in the pre workshop comments of San Diego Gas & Electric Company and Sempra Generation).

The definition of a CBAA need not be a factor in determining which transactions are bundled and which transactions are REC-only other than ensuring that bundled transactions involve energy delivery to a CBAA. However, going further and requiring specific transmission paths from particular renewable facilities to a CBAA would reduce the level of eligible bundled transactions and increase costs for ratepayers. Costs for ratepayers can be expected to be lowest if they have access to the broadest set of eligible renewable resources in meeting RPS targets. This would be possible if the definition of REC-only transactions is limited to those transactions that only involve RECs.

5. Which topics discussed at the workshop appear to be resolved? What is the resolution, and what is the basis for concluding that a resolution has occurred?

The Workshop discussed several important issues related to the recent TREC decision. Listed below are a few of these issues that RBS believes are noteworthy:

- a) Functionality for dynamic transfers is currently not available at the CAISO for renewable resources with variable output. Further, there may also be limitations for entities in the Northwest such as the Bonneville Power Administration

(“BPA”) that may limit the levels of dynamic transfers for renewable resources even after the CAISO is able to offer this functionality. Thus, the TREC decision as it stands would seriously limit opportunities for contracting with out-of-state renewable resources if dynamic transfers are the only transactions that are considered bundled.

- b) Dynamic transfers are the only arrangement that come close to actual instantaneous transfer of renewable energy from a particular facility to California over a firm transmission path. All other arrangements must, by definition, involve some form of substitution of renewable energy from a particular facility by system energy for balancing and firming. In the case of transactions utilizing firm transmission that are not dynamically scheduled, such substitution occurs within the hour as the intertie schedule must remain fixed while the actual output of the renewable facility varies. In the case of firming and shaping transactions, the substitution can occur over a longer time frame such as a calendar year. Precluding transactions that deliver bundled energy and RECs to California at a fixed price just because they involve some form of substitution will reduce the eligible supply of renewable resources and only raise costs for ratepayers.
- c) While dynamic scheduling of conventional resources into the CBAA may add flexibility, in case of renewable resources with variable output, dynamic scheduling does just the opposite and adds to the firming and balancing requirements that must be provided by a CBAA. In some cases where balancing

and firming services are not available in the source BAA (e.g. in the Southwest), dynamic scheduling may be the only viable option available to contract with an eligible renewable resource outside California. In other instances (e.g., the Northwest), where such balancing and firming services may be available at lower cost, it may be preferable to rely on such services in the Source BAA without using dynamic transfers. Consequently, dynamic transfers can be a useful option but should not be the only option for contracting with renewable resources outside California.

- d) Defining bundled transactions as only those that are dynamically scheduled and/or have specific levels of firm transmission from the actual RPS eligible generation resource to California can be complex and can only be attributed to a misplaced focus on tracking the transfer of renewable MWh from a particular facility to California. This seems completely at odds with the stated intent to allow unlimited TRECs after December 31, 2011.

6. Which topics discussed at the workshop appear to require further work? What is the basis for that evaluation?

A requirement of procuring firm transmission from an eligible renewable facility to California in order to be considered a bundled transaction raises several technical questions. For example, does the level of transmission that must be reserved have to correspond to the facility rating or the average expected output (e.g. 30 percent)? If transmission reservations of less than full output are allowed, there will be instances where system energy may have to be substituted.

On the other hand, requiring transmission reservations for the full output of the facility will not be efficient given the variable output of the facility. Another issue is whether procurement of long-term firm transmission is necessary in advance or is it sufficient to have an obligation to procure a contiguous transmission path prior to physical delivery.

7. Any other issues related to the use of TRECs discussed at the workshop that the commenter believes should be addressed further.

An overall guiding principle should be the least cost reliable attainment of RPS goals. The overarching procurement goal for bundled REC and energy transactions is to find a least cost solution. Classifying bundled transactions as REC-only transactions and subjecting them to a cap will preclude such transactions going forward and only increase RPS costs.

Given the interconnected nature of the electrical grid, it is physically impossible to separate renewable energy from fossil fuel energy and contractual paths are at best an accounting mechanism. Therefore, the focus should be on verification that an RPS eligible facility has actually generated renewable energy and displaced fossil fuel MWhs rather than tracking which MWhs ultimately reach a CBAA and over which transmission path. This will expand the pool of eligible resources and ultimately result in the lowest REC prices for consumers.

Respectfully submitted,



DOUGLASS & LIDDELL

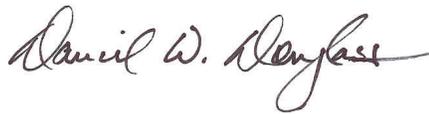
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April 30, 2010

VERIFICATION

I, Daniel Douglass, am counsel for the Sempra Energy Solutions LLC and Sempra Energy Trading LLC, as agent of The Royal Bank of Scotland, plc and am authorized to make this Verification on their behalf. I declare under penalty of perjury that the statements in the foregoing copy of Post Workshop Comments of The Royal Bank of Scotland plc, filed in R.06-02-012 and R.08-08-009, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on May 3, 2010 at Woodland Hills, California.

A handwritten signature in cursive script that reads "Daniel W. Douglass". The signature is written in dark ink and is positioned above the printed name of the firm.

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Post Workshop Comments of The Royal Bank of Scotland plc* on all parties of record in **R.06-02-012** and **R.08-08-009** by serving an electronic copy on their email addresses of record and, for those parties without an email address of record, by mailing a properly addressed copy by first-class mail with postage prepaid to each party on the Commission's official service list for this proceeding.

This Certificate of Service is executed on May 3, 2010, at Woodland Hills, California.



Michelle Dangott

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