



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

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Application of Southern California Edison )  
Company (U 338-E) For Authorization to )  
Recover Costs Necessary to Co-Fund a )  
Feasibility Study of a California IGCC with )  
Carbon Capture and Storage )

A.09-04-008  
(Filed on April 3, 2009)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), PACIFIC  
GAS & ELECTRIC COMPANY (U 39 E), AND SAN DIEGO GAS & ELECTRIC  
COMPANY (U 902 E) ON THE PROPOSED DECISION ON THE PETITION FOR  
MODIFICATION**

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COMPANY (U 902 E) ON THE PROPOSED DECISION ON THE PETITION FOR  
MODIFICATION**

Pursuant to Rule 14.3 of the California Public Utilities Commission’s (“Commission”) Rules of Practice & Procedure and the procedural schedule set forth in the May 19, 2010 Notice of Proposed Decision (“PD”), Southern California Edison Company (“SCE”), Pacific Gas & Electric Company (“PG&E”), and San Diego Gas & Electric Company (“SDG&E”) (collectively referred to as the “IOUs”) respectfully submit the following comments on the PD issued by Commission President Peevey on the Petition for Modification of Decision (D.) 09-12-014 (Petition).<sup>1</sup>

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<sup>1</sup> Decision (D.) 09-12-014 approved SCE’s request to co-fund and participate in a feasibility study to determine the technical feasibility and commercial reasonableness of an integrated gasification combined cycle (“IGCC”) facility with carbon capture for use in enhanced oil recovery (“EOR”) with sequestration. The facility is commonly referred to as Hydrogen Energy California (“HECA”). SDG&E and PG&E are not participating in the HECA feasibility study. The HECA project is being developed by Hydrogen Energy International LLC/Hydrogen Energy California LLC (“HEI/HECA LLC”).

## I.

### INTRODUCTION

The IOUs support the PD, which grants the Petition and modifies D.09-12-014 to clarify the scope of cooperative activities that the Commission expects among the IOUs in connection with their joint participation in the Hydrogen Energy California (“HECA”) project.<sup>2</sup> The PD reiterates the importance of the HECA project to California’s clean energy goals, and acknowledges the role that the IOUs can fulfill as instruments of Commission policy to implement those goals. In recognition of this, the PD modifies D.09-12-014 to establish the requisite elements of antitrust immunity for the IOUs’ joint activities on the HECA project, in accordance with the judicially-created State Action Doctrine.

First, the PD provides a clearly-articulated State policy regarding the IOUs’ cooperative activities in connection with the commercialization of the HECA project:

In further recognition of the importance of the HECA project to California’s ability to meet its clean energy goals, the Commission hereby determines that the State’s IOUs – SCE, PG&E, and SDG&E – should jointly pursue commercialization of carbon capture and sequestration technology via the HECA project, and that their exchange of confidential and/or competitively-sensitive information related to the HECA project shall be deemed to have been undertaken at the express direction and under the supervision of the Commission in furtherance of an expressly-articulated state policy.<sup>3</sup>

Second, the PD establishes active supervision of that State policy by requiring that the IOUs make regular progress reports (at least every six months) to the Commission regarding the

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<sup>2</sup> The PD expresses disappointment that the IOUs did not file the Petition in a “more timely fashion.” The IOUs want to assure the Commission that they are working together on HECA in a timely fashion. Over the past few months, the IOUs have worked together to develop a framework, including information sharing guidelines, which will allow the IOUs to begin negotiations, once the Commission issues a final decision authorizing joint negotiations. While no substantive negotiations have commenced, developing the framework for negotiations was a necessary interim step given the substantial complexities raised by the HECA project. The contemplated joint negotiations among the IOUs and HEI/HECA LLC will likely be a complex and difficult activity, which will require the IOUs and HEI/HECA LLC to address novel legal and commercial issues. While the negotiating process may be lengthy, the IOUs expect the process going forward to be more efficient given the substantial efforts the IOUs have made to date to develop a framework for the negotiations.

<sup>3</sup> PD, Ordering Paragraph No. 2 (modifying D.09-12-014 to add Conclusion of Law No. 15) at p. 14.

progress and status of the IOUs' activities for the HECA project.<sup>4</sup> In addition, the PD provides that the Division of Ratepayer Advocates ("DRA") and The Utility Reform Network ("TURN") shall have access to progress reports and other additional documents related to the HECA project, pursuant to the confidentiality restrictions of Public Utilities Code Section 583 (for DRA) or the non-disclosure agreements provided in the Procurement Review Group Process (for TURN).<sup>5</sup>

In the comments below, the IOUs recommend a few minimal changes to the PD to clarify that the Commission's order specifically covers the IOUs' joint negotiations regarding *the terms and conditions of a power purchase agreement ("PPA") for HECA output*. Given that the antitrust concerns relate to the IOUs' joint negotiations of a PPA, the Commission's articulated policy and active supervision should relate to the IOUs' joint negotiations to purchase power from HECA, not other elements of the HECA project unrelated to that activity. The IOUs explain the recommended changes in Section II below. Attachment A provides a Subject Index of Specific Recommended Changes to the PD.

## II.

### DISCUSSION

#### A. Commission Review and Approval of Agreements

The PD modifies D.09-12-014 to add a new ordering paragraph to that decision:

8. Any agreement reached between the parties with respect to the Hydrogen Energy California Project must be filed with the Commission for approval and shall be of no force and effect until filed with the Commission and approved in a written order after Commission review.

The IOUs agree that the Commission must review and approve any agreements between the IOUs and HEI regarding the purchase of power from HECA. But requiring Commission

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<sup>4</sup> PD, Ordering Paragraph No. 3 (modifying D.09-12-014 to add Ordering Paragraphs Nos. 6, 7, and 8) at p. 15.

<sup>5</sup> PD, Ordering Paragraph No. 3 (modifying D.09-12-014 to add Ordering Paragraphs Nos. 6, 7, and 8) at p. 15.

approval of all agreements related to HECA (even those unrelated to power purchase issues) is unnecessary.

The antitrust issues that are of concern here relate to the IOUs' negotiation of the terms and conditions of a PPA for HECA output. As with any complex power-purchase transaction between a utility and energy producer, there potentially may be a number of ancillary agreements that the IOUs and HEI/HECA LLC may need to enter into to facilitate negotiations. The ancillary agreements, for example, could likely include non-disclosure agreements, non-binding letters of intent, term sheets and other related negotiation-process agreements necessary to facilitate negotiations. Although such ancillary agreements will likely be necessary to establish the protocols and timing of the negotiation process, they do not raise substantive antitrust concerns, and the Commission does not need to review and approve them to satisfy the articulated policy or active supervision prongs of the State Action Doctrine. Accordingly, the IOUs recommend the following change to this ordering paragraph:

8. Any agreement reached between the parties with respect to the **purchase of power from the** Hydrogen Energy California Project must be filed with the Commission for approval and shall be of no force and effect until filed with the Commission and approved in a written order after Commission review.

The PD establishes an appropriate regulatory framework to actively supervise the IOUs' activities, without adding this extra, unnecessary burden on the Commission. Specifically, Ordering Paragraph No. 3 modifies D.09-12-014 to provide the following supervision requirements:

- “joint submission to the Commission for its approval by application . . . of a proposed PPA or PPAs for the power output from HECA.”<sup>6</sup>
- “joint submission of regular progress reports at intervals of not less than six months on the progress and status of the IOU Activities in support of HECA . . . ,

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<sup>6</sup> PD, Ordering Paragraph No. 3 (modifying D.09-12-014 to add Ordering Paragraphs Nos. 6, 7, and 8) at p. 15.

including reports regarding the development of information sharing guidelines and procedures.”<sup>7</sup>

- “at the discretion of the Commission’s Energy Division, appointment of an Independent Evaluator (IE) to assist in the Commission’s supervision of the IOUs’ joint negotiation of a PPA for the output of HECA project and associated contractual arrangements.”<sup>8</sup>

The proposed change is consistent with these requirements. Further, any ancillary agreements would be the subject of the progress reports required by the PD. If appointed, the IE will also assist in the review and supervision of these types of agreements. Consequently, Commission review and approval of every agreement related to the HECA project is unnecessary, given the active-supervision requirements described above.

On a related note, this change will streamline the IOUs’ negotiating process with HEI/HECA LLC, and ensure that the Commission does not get bogged down in reviewing and approving a series of minor ancillary agreements unrelated to the terms and conditions of a HECA PPA. Requiring Commission review and approval for these type of agreements would likely waste Commission resources and cause unnecessary delays.

## **B. Information Disclosure**

The PD also modifies D.09-12-014 to add the following new ordering paragraph to that decision:

7. The Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) shall have access to the reports to the Commission, referenced above, and in addition DRA and TURN, may seek any additional documents exchanged between each of the IOUs relating to the Hydrogen Energy California (HECA) project or between any investor-owned utility and Hydrogen Energy International and/or Hydrogen Energy California LLC relating to the HECA project, provided that documents marked

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<sup>7</sup> PD, Ordering Paragraph No. 3 (modifying D.09-12-014 to add Ordering Paragraphs Nos. 6, 7, and 8) at p. 15.

<sup>8</sup> PD, Ordering Paragraph No. 3 (modifying D.09-12-014 to add Ordering Paragraphs Nos. 6, 7, and 8) at p. 15.

confidential shall remain confidential pursuant to California Public Utilities Code Section 583 or the non-disclosure agreements provided in the Procurement Review Group Process.

The IOUs generally agree that providing DRA and TURN access to progress reports and additional documents could assist the Commission fulfill its active supervision of the IOUs' activities. However, as noted above, the antitrust issues raised here relate to the IOUs' negotiations of a HECA PPA. Therefore, to address PPA issues and the Commission's active supervision of the IOUs' negotiation activities, DRA's and TURN's access to additional documents should directly concern the **purchase of power** from HECA. Accordingly, the IOUs recommend the following change to this ordering paragraph:

7. The Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) shall have access to the reports to the Commission, referenced above, and in addition DRA and TURN, may seek any additional documents exchanged between each of the IOUs relating to the **purchase of power from the** Hydrogen Energy California (HECA) project or between any investor-owned utility and Hydrogen Energy International and/or Hydrogen Energy California LLC relating to the **purchase of power from the** HECA project **after the IOUs submit a PPA to the Procurement Review Group (PRG)**, provided that documents marked confidential shall remain confidential pursuant to California Public Utilities Code Section 583 or the non-disclosure agreements provided in the Procurement Review Group Process.

As explained above, the PD adequately ensures that all relevant information related to the IOUs' negotiating activities will be reviewed, through regular progress reports submitted by the IOUs and a possible IE to assist in the supervision of the IOUs' activities. In addition, it is important to note that DRA and TURN and other interested parties will still have access to information regarding the HECA feasibility study. Pursuant to the Public Disclosure Plan approved by D.09-12-014, SCE and HEI will provide HECA feasibility study results to interested parties. Indeed, SCE and HEI conducted two comprehensive workshops in February,

2010, covering the Phase I reports, and provided copies of those reports to DRA and TURN. The reports provide technical information about the HECA project.<sup>9</sup>

### III.

#### CONCLUSION

The IOUs support the PD, which modifies D.09-12-014 to clarify the scope of cooperative activities that the Commission expects among the IOUs in connection with their joint participation in the HECA project. For the reasons explained above, the IOUs recommend minimal changes to the PD to clarify that the Commission's order specifically concerns the IOUs' joint negotiations regarding *the terms and conditions of a PPA for HECA output*. Attachment A provides a Subject Index of Specific Recommended Changes to the PD.

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<sup>9</sup> HEI prepared approximately 28 reports on the following subjects: technology appraisal; feedstock and water; process and system configuration; EOR and carbon sequestration; environmental safety and health; operations, maintainability and constructability; water treatment; acid gas removal; CAISO interconnection; value engineering; and a PDP.

Respectfully submitted,

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May 28, 2010

**Attachment A**

**SUBJECT INDEX OF SPECIFIC RECOMMENDED CHANGES TO  
PROPOSED DECISION**

## **SUBJECT INDEX OF SPECIFIC RECOMMENDED CHANGES**

### **TO PROPOSED DECISION**

Pursuant to Rule 14.3 (b) of the Commission's Rules of Practice and Procedure, SCE, PG&E, and SDG&E submit the following recommended changes to the Proposed Decision:

#### **A. Proposed Changes to Order**

1. The Commission should modify Ordering Paragraph No. 3 (which adds Ordering Paragraph 7 to D.09-12-014) as follows:

7. The Division of Ratepayer Advocates (DRA) and The Utility Reform Network (TURN) shall have access to the reports to the Commission, referenced above, and in addition DRA and TURN, may seek any additional documents exchanged between each of the IOUs relating to the **purchase of power from the** Hydrogen Energy California (HECA) project or between any investor-owned utility and Hydrogen Energy International and/or Hydrogen Energy California LLC relating to the **purchase of power from the HECA project after the IOUs submit a PPA to the Procurement Review Group (PRG)**, provided that documents marked confidential shall remain confidential pursuant to California Public Utilities Code Section 583 or the non-disclosure agreements provided in the Procurement Review Group Process.

2. The Commission should modify Ordering Paragraph No. 3 (which adds Ordering Paragraph 8 to D.09-12-014) as follows:

8. Any agreement reached between the parties with respect to the **purchase of power from the** Hydrogen Energy California Project must be filed with the Commission for approval and shall be of no force and effect until filed with the Commission and approved in a written order after Commission review.”

**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 COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (u 338-e), PACIFIC GAS & ELECTRIC COMPANY (U 39 E), AND SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) ON the PROPOSED DECISION ON THE PETITION FOR MODIFICATION 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 **28th day of May, 2010**, at Rosemead, California.

/s/ Raquel Ippoliti  
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California Public  
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