



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Integrate and)
Refine Procurement Policies and Consider Long)
Term Procurement Plans)
_____)

R.10-05-006
(Filed May 6, 2010)

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338-E) IN
RESPONSE TO COMMENTS ON TRACK I PLANNING STANDARDS AND
ASSUMPTIONS**

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Dated: **June 28, 2010**

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Pursuant to Administrative Law Judge (ALJ) Victoria Kolakowski’s May 28 Ruling on Procurement Planning Standards and Setting Schedule for Comments and Workshops (May 28 Ruling), Southern California Edison Company (SCE) submits the following comments in response to other parties’ June 21, 2010 comments on Planning Standards and the Planning Standards workshop held on June 11, 2010.

I.

INTRODUCTION

In its June 21, 2010 comments on resource planning assumptions, the Alliance for Retail Energy Markets (AReM) makes recommendations that are inconsistent with the California Public Utility Commission’s (the Commission) statutory obligation under Senate Bill (SB) 695 to ensure that all benefiting customers share equally the costs of developing new system resources needed to maintain system reliability. In the comments below, SCE urges the Commission to deny those recommendations. SCE also addresses comments raised by the Division of Ratepayer Advocates (DRA), Sierra Club California (Sierra Club), Pacific

Environment, Pacific Gas and Electric Company (PG&E) and the Natural Resource Defense Council and Union of Concerned Scientists (NRDC/UCS). In the interest of brevity, SCE does not address more general comments or factual statements (or misstatements) by parties that do not directly include specific recommendations for revised planning standards or assumptions, as those are beyond the scope of this particular set of comments.

II.

DISCUSSION

A. Resource Needs Identified in the System Planning Process Must Be Addressed in a Manner that Does Not Discriminate Against Bundled Customers.

In its comments, AReM suggests that resources serving the investor-owned utilities' (IOU) bundled customers, including IOU-owned resources and projected bilateral contracts, should be deducted from the System Plans. Specifically, AReM states:

The resources needed to meet the IOUs' forecast bundled load are, therefore, not required to meet "System" need and should be deducted from the System Plan. This objective can be easily accomplished by adding a row or rows to the "System Resources" section of the System Table that lists the IOU-owned resource additions and projected bilateral contracting separately from resources owned or planned by Publicly-Owned Utilities ("POUs") and by independent power producers. Making this change would clearly identify the proportion of System Resources needed to satisfy the Bundled Plans.¹

AReM obfuscates the distinction between a "system resource plan," which is a tabulation of *physical* resources available in the electrical system including any forecast retirements and additions, and a "bundled customer procurement plan," which represents a framework for how the IOUs *contractually* procure capacity, energy and natural gas from the competitive wholesale markets on behalf of their bundled customers. The IOUs' Commission-approved procurement

¹ Comments of AReM on Resource Planning Assumptions – Part 1 and Procurement Planning Assumptions, June 21, 2010 (AReM Comments), at 3. (citations omitted)

authority allows the IOUs to sign contracts shorter than five years in duration. In previous proceedings, the Commission determined that long-term contracts are needed to solicit investment in new generation.² In addition, it is generally known that new capacity additions cost significantly more than capacity and energy purchased from existing resources. By law, IOUs' bundled customers may not be subjected to any unique or different obligations than any other customers of the electrical system to add or support new capacity additions to the system.³ Therefore, it would be unlawful for bundled customers to be forced to shoulder the cost of new capacity additions while other load serving entities (LSE), such as energy service providers (ESP) and their customers, are permitted to purchase all capacity and energy to meet their customers' contractual needs from existing resources at a discount.

AReM's attempt to make new capacity additions purely a bundled customer issue is unfounded. The system resource plan must look only at the projected physical load and resource balance in the electrical system, and should not focus on the contractual commitments between LSEs and resource owners. AReM's proposal regarding new capacity is contrary to law and should be rejected.

The Commission should reaffirm in this proceeding that maintaining system reliability in light of competitive wholesale and retail markets is not an IOU responsibility. IOUs' bundled

² See, e.g., Decision (D.) 06-07-029 at FOF 6 ("We find that long-term contracts are necessary to solicit investment in new generation in California.")

³ See SB 695, *codified at* Pub. Util. Code § 365.1(c) ("Once the commission has authorized additional direct transactions pursuant to subdivision (b), it shall do both of the following: (1) Ensure that other providers are subject to the same requirements that are applicable to the state's three largest electrical corporations under any programs or rules adopted by the commission to implement the resource adequacy provisions of Section 380, the renewables portfolio standard provisions of Article 16 (commencing with Section 399.11), and the requirements for the electricity sector adopted by the State Air Resources Board pursuant to the California Global Warming Solutions Act of 2006 (Division 25.5 (commencing with Section 38500) of the Health and Safety Code). This requirement applies notwithstanding any prior decision of the commission to the contrary. (2) Ensure that, in the event that the commission authorizes, in the situation of a contract with a third party, or orders, in the situation of utility-owned generation, an electrical corporation to obtain generation resources that the commission determines are needed to meet system or local area reliability needs for the benefit of all customers in the electrical corporation's distribution service territory, the net capacity costs of those generation resources are allocated on a fully nonbypassable basis consistent with departing load provisions as determined by the commission, to all of the following: (i) Bundled service customers of the electrical corporation. (ii) Customers that purchase electricity through a direct transaction with other providers. (iii) Customers of community choice aggregators.") See also Pub. Util. Code §§ 399.11(g)(2)-(3) and 380(e).

customers shoulder no different responsibility than the customers of any other LSE to ensure that there are adequate resources to operate a reliable electric system and that new resource additions meet the State's policy objectives. Pacific Environment admits confusion regarding the distinction between system and bundled need, and states, "Here, the absence of a specific definition of system and bundled loads also raises concerns because it is unclear how the OTC [once-through-cooling] and RPS [renewables portfolio standard] considerations will be integrated into both phases consistently and how need determinations can be done to ensure integration of renewable and OTC requirements."⁴ Sierra Club argues that "[t]he inputs for the system resource plans and the *bundled plans* must incorporate targets that meet state requirements and policy goals, and clearly compare these to the annual amount of each resource in the plan."⁵ These statements indicate that there is a flawed perception of the IOUs' procurement activities to serve their bundled customers, including their compliance with the loading order, and whether, and if so how, such comparatively shorter-term procurement activity impacts the physical resource mix in the electrical system and contributes toward the achievement of State resource policy objectives. SCE urges the Commission to clarify that while the IOUs are being asked to prepare system-wide resource planning analyses for this proceeding, and indeed, if deemed necessary, may be authorized to procure new resources on behalf of the entire system, responsibility for ensuring the availability of new resources to meet the State's system reliability and environmental policy goals does not rest with IOU customers and is not addressed through bundled customer procurement activity.

⁴ Comments of Pacific Environment on Draft Planning Assumptions, June 21, 2010, at 10.

⁵ Comments of Sierra Club California on Initial Ruling on Procurement Planning Standards, June 21, 2010, at 4. (emphasis added)

B. AReM is Wrong to Suggest that Implementation of the State’s Once-Through-Cooling Policy is Solely the Responsibility of Bundled Customers.

In its June 21 comments, AReM suggests that any system resource retirements to phase out resources that rely on once-through-cooling (OTC), or for any other reason, must be addressed in bundled customer procurement plans, stating:

However, “retirements,” including those retired to comply with the state’s OTC policies, are only reflected in the System Tables when, in fact, the units affected by OTC are used today primarily to meet *bundled load*. Therefore, retirements for OTC or any other reason must be addressed in the Bundled Plans and the IOUs must plan to replace the retiring capacity and energy for their Bundled Load. The Scoping Memo should direct that the Bundled Plans and associated Tables be modified to include retirements of generating facilities used to meet bundled load.⁶

AReM’s arguments are fundamentally flawed for several reasons. First, the implementation of the State Water Resources Control Board’s (Water Board) OTC policy is a system-wide resource issue that impacts the reliability of the entire electrical system in the State of California, including facilities within and outside of the California Independent System Operator (CAISO) footprint. In fact, the Water Board’s policy impacts 19 existing power plants representing over 21,000 megawatts of installed electricity generation capacity in California. Retirement of this much capacity, without a suitable resource plan to mitigate the impact, would render California’s electrical system inoperable. Furthermore, other than the two nuclear plants and the Humboldt Bay Power Plant in California, all OTC plants are owned by either independent power producers or publicly owned utilities and not the IOUs.⁷ Therefore, AReM misses the mark when it suggests that the IOUs must plan to replace retiring OTC capacity and that the phase-out of OTC should be addressed in the IOUs’ bundled customer procurement plans.

⁶ AReM Comments at 4. (citations omitted)

⁷ A map of the 19 power plants in California that utilize OTC (and their respective plant operators) is available at: <http://www.cacoastkeeper.org/programs/healthy-marine-habitats/power-plants-otc>.

Indeed, the Commission should reaffirm in its Scoping Memo that implementation of the State's OTC policy is a system-wide resource issue, and that the cost of any infrastructure necessary to mitigate the impact of OTC plants' retirements should be borne equally by all customers in the electrical system, including the IOUs' bundled customers, Direct Access (DA) customers, Community Choice Aggregation (CCA) customers, Publicly-Owned-Utility (POU) customers, municipal departing load customers, and self-generation customers.

Second, the obligation to comply with the Water Board's OTC policy rests with the generator facility owner and is not in any way linked to whether a particular LSE happens to have a contract with that generator at the time the 2010 LTPP proceeding was initiated. Since none of the fossil OTC generators interconnected in SCE's service territory are owned by SCE, any assumptions about the willingness of the owners to comply with OTC requirements or the retirement of OTC plants are not governed by SCE or its bundled customers. SCE cannot dictate the retirement or repower decisions of the private owners of fossil OTC generation.

Finally, SB 695 expressly requires that all direct access providers are subject to the same resource adequacy requirements as IOUs, including their share of costs associated with meeting the state's OTC policy goals.⁸ For all of these reasons, SCE urges the Commission to continue to address the implementation of the State's OTC policy in Track I as a system issue.

⁸ See Pub. Util. Code § footnote 3 Pub. Util. Code § 365.1(c)(2) ("Once the commission has authorized additional direct transactions pursuant to subdivision (b), it shall. . . [e]nsure that, in the event that the commission authorizes, in the situation of a contract with a third party, or orders, in the situation of utility-owned generation, an electrical corporation to obtain generation resources that the commission determines are needed to meet system or local area reliability needs for the benefit of all customers in the electrical corporation's distribution service territory, the net capacity costs of those generation resources are allocated on a fully nonbypassable basis consistent with departing load provisions as determined by the commission, to all of the following: (i) Bundled service customers of the electrical corporation. (ii) Customers that purchase electricity through a direct transaction with other providers. (iii) Customers of community choice aggregators.") (emphasis added).

C. Bundled Service Customers Should Not Bear All of the Costs Associated with the Integration of All New Renewable Generation Resources Needed to Meet the State's Renewable Resource and Greenhouse Gas Goals.

AReM recommends that the Commission direct the IOUs to include in their Bundled Plans all transmission and distribution (T&D) costs associated with the integration of renewable resources needed to meet their portion of the State's Renewables Portfolio Standard (RPS) and greenhouse gas (GHG) goals.² In making this argument, however, AReM incorrectly assumes that there will be LSE-specific T&D costs associated with LSE-specific procurement requirements. The assumption that T&D infrastructure requirements can be traced to each individual LSE's procurement requirements is simply flawed. The costs of T&D infrastructure, whether to achieve RPS, GHG or other goals, are allocated equally to all similarly-situated bundled and DA customers. Without knowing which specific T&D facilities are needed to meet the Commission's various policy objectives, the only reasonable alternative for the Commission is to embed T&D costs in the calculation of the Net Present Value Revenue Requirement, as proposed by Commission Staff. Accordingly, the Commission should reject AReM's recommendation to require inclusion of T&D costs for renewable resources needed to meet RPS and GHG targets in the IOUs' Bundled Plans.

D. Net Qualifying Capacity Values Should Be Used for All Resources.

In comments regarding the assumptions for capacity values of RPS resources, DRA recommends that, for consistency, the parties use the renewable capacity valuation methodology employed by Energy and Environmental Economics (E3) in the Commission's Resource Ranking and Selection Methodology for the 33% RPS Implementation Analysis, instead of the NQC values adopted by the Commission in its Resource Adequacy (RA) Rulemaking (R.05-12-

² AReM Comments at 4.

013), as recommended by Commission Staff.¹⁰ While DRA’s “consistency” goal is valid, the E3 analysis cited by DRA does not reflect the Commission’s adopted rules for determining the value of RPS capacity. Through resource adequacy (RA) rulemakings, the Commission determines the counting rules for resource capacity, including RPS resources. Those counting rules are used by LSEs to comply with the Commission’s RA requirements. For intermittent wind and solar resources, the Commission adopted the exceedance methodology for determining NQC in 2009.¹¹ While DRA did not support that determination, it has already been adopted by the Commission and should not be relitigated here. SCE therefore supports Staff’s recommendation that NQC values be used for the capacity values of resources in the LTPP, including RPS resources.

E. Responses to Additional Comments on Staff’s Proposed Planning Standards and Assumptions.

DRA, Sierra Club and Pacific Environment recommend that the Commission use a 1-in-2 load forecast for the system resource analyses.¹² These parties express the concern that using a 1-in-10 metric will lead to overprocurement of new fossil fuel generation resources. SCE does not support these recommendations. CAISO’s local capacity requirements (LCR) studies, which form the basis for the Commission’s current local resource adequacy requirements governing the IOUs’ procurement plans, are based on a 1-in-10 load forecast. In addition, the May 28 Ruling suggests that the CAISO’s “Enhanced” 10-yr LCR study will be a key component of generation planning in the Commission’s process.¹³ SCE believes that it is imperative that the LTPP

¹⁰ Comments of the DRA on Resource Planning Assumptions, Part 1: Procurement planning assumptions and “Rulebook,” June 21, 2010 (DRA Comments) at 4.

¹¹ See D.09-06-028 at COL 4.

¹² Comments of the DRA on Resource Planning Assumptions, Part 1: Procurement planning assumptions and “Rulebook,” June 21, 2010 (DRA Comments) at 7; Comments of Pacific Environment on Draft Planning Assumptions, June 21, 2010, at 8-9; Comments of Sierra Club California on Initial Ruling on Procurement Planning Standards, June 21, 2010, at 5-6.

¹³ May 28 Ruling at 8.

planning assumptions properly reflect the assumptions of the studies that the planning process is relying upon.

Furthermore, the CAISO's LCR study assumptions and methodology are vetted in the various Resource Adequacy (RA) proceedings and have formed the basis of the Commission-approved LCR requirements every year since such requirements have existed. To the extent the Commission sees any merit in revisiting the load forecasting conventions used in the CAISO studies that currently drive local RA requirements, which in the future will greatly influence local reliability studies in light of renewable resource integration and phase-out of OTC, this topic must be discussed and resolved in the RA proceedings, not here.

DRA recommends updating the market price referent (MPR) proxy value for CO₂ as part of this proceeding.¹⁴ In addition, DRA proposes to perform multiple CO₂ price scenarios.¹⁵ It is not appropriate to burden this proceeding with the task of updating values for use in a future MPR proceeding. Should the Commission update its current assumptions concerning future CO₂ compliance costs in the MPR Proceeding or another proceeding, SCE would not object to reflecting the new assumptions, assuming there is adequate time to do so. Based on the June 18, 2010 workshop, it appears that Commission Staff intends to limit resource plan scenario analyses to different variations of renewable power build outs, and does not plan to directly consider different approaches to GHG compliance. While SCE has concerns with Staff's proposed prioritization, it is impractical to add additional scenarios to those already planned, given the amount of work required to perform scenario development.

PG&E suggests performing high and low gas price sensitivities based on the California Energy Commission's (CEC) most recent high and low California gas price scenarios.¹⁶ It is not clear to SCE how this recommendation can be made consistent with use of a base case natural

¹⁴ DRA Comments at 6. ("Given the quick evolution of GHG regulation and GHG compliance costs, the MPR methodology for GHG compliance costs may need to be revisited and updated. DRA recommends that Staff consider updating the MPR proxy using the CO₂ allowance price forecasts modeled in the recent CARB report, '*Updated Economic Analysis of California's Climate Change Scoping Plan*' (2010)".)

¹⁵ *Id.*

¹⁶ PG&E's Comments on Resource Planning Assumptions (Part 1) and Rulebook, June 21, 2010, at 5.

gas price forecast tied to the MPR methodology, as proposed in the May 28 Ruling, or with PG&E's recommendation to use sensitivity values based on 90% confidence range.

NRDC/UCS recommend using a 3% real discount rate, since this is a value used by the CEC for evaluating energy efficiency standards.¹⁷ While the choice of discount rate has been controversial, the Commission declined to adopt this recommendation in other forums for cost effectiveness evaluations and should not do so here.¹⁸ In addition to the theoretical problems with a "social" discount rate, there is the obvious practical concern that using a 3% discount rate would result in making resource investments as if the cost to ratepayers were only 3% (equivalent to about 5% in nominal dollars), yet actually charging ratepayers for these investments based on either a utility cost of capital around 10%, or the potentially higher rate of return demanded by independent power producers.

¹⁷ Comments of NRDC/UCS on Resource Planning Assumptions—Part 1, Procurement Planning Assumptions and Rulebook, June 21, 2010, at 2-3.

¹⁸ *See, e.g.*, D.06-11-018 at 37 (regarding transmission); D.05-04-051 at 6 (regarding energy efficiency).

III.

CONCLUSION

SCE appreciates the opportunity to review Staff's proposed planning standards and assumptions prior to the issuance of a scoping ruling in this proceeding. In preparing that scoping ruling, SCE urges the assigned administrative law judge and assigned commissioner not to incorporate the recommended changes to Staff's proposed planning standards and assumptions addressed herein.

Respectfully submitted,

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June 28, 2010

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U-338-E) IN RESPONSE TO COMMENTS ON TRACK I PLANNING STANDARDS AND ASSUMPTIONS** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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 June, 2010**, at Rosemead, California.

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