BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.	Rulemaking 08-08-009 (Filed August 21, 2008)

COMMENTS OF THE INDEPENDENT ENERGY PRODUCERS ASSOCIATION AND THE CALIFORNIA WIND ENERGY ASSOCIATION ON THE AMENDED 2010 RPS PROCUREMENT PLAN OF SOUTHERN CALIFORNIA EDISON COMPANY

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BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Pursuant to the March 19 Ruling of Administrative Law Judge Burton Mattson, the Independent Energy Producers Association (IEP) and the California Wind Energy Association (CalWEA) submit their Comments on *Southern California Edison Company's Amended 2010 RPS Procurement Plan,* filed on April 9, 2010. IEP and CalWEA take this opportunity to bring to the Commission's attention what we believe is an unnecessary and inappropriate tension between the proposed treatment of energy-only RPS resources by Southern California Edison Company (SCE), as described in Section 6.5 of SCE's Amended 2010 RPS Procurement Plan, and the application of the Commission-approved Least-Cost/Best-Fit (LCBF) evaluation methodology.

As described in Section 6.5, SCE amended its Pro Forma Renewable Power Purchase and Sale Agreement to include the requirement that "seller's interconnection applications [shall] provide for full deliverability so that they receive resource adequacy benefits and are obligated to pay their portion of any deliverability upgrades."[1] SCE has made this

[1] Southern California Edison Company's Amended 2010 RPS Procurement Plan, p. 36.

change in response to recent changes related to the Large Generator Interconnection Procedures of the California Independent System Operator (CAISO), which have the effect of distinguishing between "fully deliverable" and "energy-only" interconnected resources. SCE explains that the distinction made by the CAISO addresses the extent to which sellers pay for network upgrade costs and share in any deliverability upgrades. Furthermore, SCE notes, "Going forward, all Commission-jurisdictional entities should require that their resources be connected via fully deliverable arrangements."[2]

IEP and CalWEA are concerned that this proposed change to SCE's Pro Forma Renewable Power Purchase and Sale Agreement (a) appears discriminatory and (b) is unnecessarily redundant to what takes place in the LCBF evaluation methodology to the extent that fully deliverable resources have higher value to SCE than energy-only transactions. IEP and CalWEA urge reconsideration of this proposal and its elimination as unnecessarily creating a barrier to RPS resource development.

The proposed change to exclude energy-only resources from consideration in the RPS context appears discriminatory. If the product sought by SCE is an "eligible renewable resource" for purposes of meeting its RPS compliance obligation, SCE's proposal to bar eligible renewable resources that are "energy-only" (in the context of the CAISO's interconnection procedures) has the effect of discriminating against resources that would otherwise be allowed to bid in SCE's RPS solicitations and potentially to qualify for a power purchase agreement. If the problem is with the CAISO's interconnection policy, the Commission should not allow its implementation of the RPS to become the tool for reforming that policy. The effect of SCE's proposed revisions to the Pro Forma Renewable Power Purchase and Sale Agreement will be to

[2] *Id.,* p. 39.

create an additional barrier to development, potentially increasing costs beyond what they would be otherwise, and ultimately hindering the achievement of RPS goals.

If an eligible renewable resource that is able to deliver Resource Adequacy (RA) capacity has additional value to SCE, SCE currently has the means to reflect that value in its evaluation of the bid or the project. The LCBF evaluation methodology currently provides a platform for integrating the value to the utility of RA capacity into the overall valuation of the project. The proper focus, from IEP and CalWEA's perspective, is to properly align the LCBF evaluation factors rather than prohibit certain types of otherwise "eligible renewable resources" from participating in the RPS program. Furthermore, it is equally critical for the value that SCE places on RA capacity, relative to all the other bid evaluation factors, to be transparent so that developers and policymakers can appreciate this value in the context of the competitive procurement and overall bid evaluation. Clearly, all things being equal, the higher the value of RA capacity in bid evaluation, relative to other bid evaluation factors, the more likely that otherwise eligible renewable resources will seek full delivery status as opposed to energy-only status in the CAISO interconnection process. For example, the Commission and utilities could consider "value subtractors" (or "adders") in bid evaluation, different values associated with various curtailment options, etc., as appropriate means to differentiate the value of energy-only versus firm capacity generation. However, it is also the case that the transmission upgrades required to ensure full deliverability may result in higher costs for renewable energy procurement. Both the RA value and the transmission upgrade cost of delivering that value should be considered appropriately in the LCBF methodology.

In summary, IEP and CalWEA are concerned that the Commission might approve a RPS Procurement Plan that would explicitly discriminate against otherwise eligible renewable

resources. We recognize that a variety of factors result in one project having higher value to the utility than another, based on various operational and locational characteristics. Fundamentally, however, higher valued projects should properly emerge from the bid evaluation process, and the Commission need not create artificial barriers that block eligible renewable resources from even participating in the bidding and bid evaluation process. Equally important is the need for the utilities to make the various bid evaluation factors and their relative weightings more transparent so that the development community can more effectively site, design, and build projects matching the utilities' needs in the context of "least-cost" and "best-fit." This improved transparency will ensure that better projects are proposed and will help ensure that valuable time and resources are not expended on developing projects that will not fare well in the competitive solicitation.

Respectfully submitted this 24th day of August, 2010 at San Francisco, California.

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By *\/s/ Brian T. Cragg*
Brian T. Cragg

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VERIFICATION

I am the attorney for the Independent Energy Producers Association in this matter, and I have been authorized to file this motion on behalf of the California Wind Energy Association. IEP and CalWEA are absent from the City and County of San Francisco, where my office is located, and under Rule 1.11(d) of the Commission's Rules of Practice and Procedure, I am submitting this verification on behalf of IEP and CalWEA for that reason. I have read the attached "Comments of the Independent Energy Producers Association and the California Wind Energy Association on the Amended 2010 RPS Procurement Plan of Southern California Edison," dated August 24, 2010. I am informed and believe, and on that ground allege, that the matters stated in this document are true.

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

Executed on this 24th day of August, 2010, at San Francisco, California.

/s/ Brian T. Cragg
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2970/010/X121653.v3

CERTIFICATE OF SERVICE

I, Melinda LaJaunie, certify that I have on this 24th day of August 2010 caused a copy of the foregoing

COMMENTS OF THE INDEPENDENT ENERGY PRODUCERS ASSOCIATION AND THE CALIFORNIA WIND ENERGY ASSOCIATION ON THE AMENDED 2010 RPS PROCUREMENT PLAN OF SOUTHERN CALIFORNIA EDISON COMPANY

to be served on all known parties to R.08-08-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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