



**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)

COMMENTS OF BEAR VALLEY ELECTRIC SERVICE,
A DIVISION OF GOLDEN STATE WATER COMPANY (U913-E),
ON THE PROPOSED DECISION OF COMMISSIONER PEEVEY
ENTITLED DECISION MODIFYING DECISION 10-03-021 AUTHORIZING
USE OF RENEWABLE ENERGY CREDITS FOR COMPLIANCE WITH THE
CALIFORNIA RENEWABLES PORTFOLIO STANDARD AND LIFTING STAY
AND MORATORIUM IMPOSED BY DECISION 10-05-018

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September 27, 2010

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I.

INTRODUCTION

Bear Valley Electric Service (BVES), a division of Golden State Water Company (U 913-E), supports the Proposed Decision (PD) of this Commission authorizing the creation of a market in tradable renewable energy credits (TREC)s. If adopted, the PD will provide the foundation for the creation and maintenance of a sustainable, liquid market in TREC)s, to the advantage of all Californians.

In these Comments, BVES expresses its support for flexibility, which the Commission has and will consider as an issue deferred in the PD. As a small utility, BVES lacks the human and material resources to match the pace the Commission sets for the large IOUs in fulfilling their renewable requirement. Small utilities are simply not able to, and cannot be expected to, keep up and risk hazarding the pocket-books of their ratepayers. The one-size-fits-all framework promoted by the large utilities is simply unworkable.

BVES also stresses the point that the Commission should allow BVES to present its TREC contracts for approval through the advice letter process, as the Commission intended, and expressly authorized, in a prior version of this PD.

II.

THE UNIQUE POSITION OF BVES WARRANTS SPECIAL CONSIDERATION TO PROTECT THE RATEPAYERS FROM UNREASONABLE RATES AND CHARGES

BVES has observed and participated in this proceeding with interest, as it endures a unique position among California electric utilities, being challenged more than others in the acquisition of resources for its renewable portfolio. That is why TREC contracts are particularly important for BVES, as the Commission has duly recognized in its PD.

On May 4, 2010, BVES joined Mountain Utilities in a response to the Joint Petition for Modification of Decision 10-03-021 filed by the three large electric utilities, Southern California Edison (U 338-E), Pacific Gas and Electric Company (U 39-E), and San Diego Gas & Electric Company (U 902-E). BVES has consistently urged the Commission to move forward with TREC contracts, for these instruments, in the framework crafted by this Commission, will be particularly useful in helping achieve our State's renewable resource goals, particularly for the small utilities that lack the market presence that the large utilities employ to their advantage.

BVES supports this Commission's PD, which does not impose TREC usage limits on small utilities. In their joint petition, the three large utilities requested that if the TREC usage limitation is not eliminated, that it be applied across-the-board, to all RPS-obligated load-serving entities. As explained at pages 23-24 of the PD, because the Commission is comprehensively addressing this and other issues related to harmonizing

the RPS rules, the Commission has not proposed to adopt here all the modifications sought by the large IOUs. This is as it should be. And it should remain so.

BVES has provided the Commission with details of its challenging and disadvantaged position relative to the large three IOUs, and, most importantly, explained the facts that made its path toward acquiring resources for its renewable portfolio challenging, to say the least, when compared to the relative, yet still incomplete ease and success the large electrical corporations have achieved.¹ Due to the scarcity of renewable resource providers interested in the very small load that BVES serves, and because of its winter peak, a load profile that is the inverse of California's demand and supply curve, the inattention of renewable resource vendors to the many efforts of BVES to attract attention to its needs were met largely with few, tepid, and unsuitable vendor responses.

For these and other reasons, the Commission has wisely acknowledged that BVES must be recognized for what it is, a small utility with limited human and material resources, whose ratepayers must be protected from the strictures of broad and expensive policies that might be forced upon them by the "one-size-fits-all" approach favored by the large IOUs.

BVES and its customers recognize that the Commission has carefully considered the legal and factual bases for according small utilities a certain amount of flexibility in filling their renewable portfolios with clean energy resources. D.10-03-021, mimeo, p. 47. The Commission must continue with this sensible approach; it facilitates the attainment of important environmental goals, and it fulfills the constitutional and statutory mandate of the Commission to protect California's ratepayers from unjust and unreasonable rates and charges.

After a great deal of effort and expense, BVES has successfully contracted with two companies that have entered into agreements that if approved by the Commission

¹ BVES has no RPS energy in its portfolio at this time.

will provide renewable resources to BVES that are compliant with Commission policy. These two contracts are pending review by this Commission in separate application proceedings.² Nonetheless, the future remains uncertain for the period beyond those contracts, and the competitive position of BVES in the renewables market remains marginal compared to the large utilities. Simply stated, the large utilities attract the interest of renewable vendors, while with its small, unusual load, BVES does not, despite diligent efforts to do so.

As a consequence, it is essential that the Commission continue its support for the laudable advances it has made to develop and sustain a market in TRECs.

BVES commends the Commission and its staff for encouraging the important development of new renewable resources, with a market that will further facilitate its development with tradable instruments. This is a giant step forward with broadly beneficial environmental, economic, and social advantages. Every step the Commission takes to preserve and enhance the TRECs program will be a step in the right direction.

III.

THE COMMISSION MUST NOT OVERLOOK THE EFFICIENCIES
THE ADVICE LETTER PROCESS BRINGS TO CONTRACT APPROVAL,
AND RETURN TO ITS ORIGINALLY INTENDED AL PROCESS FOR BVES,
TO RELIEVE THE RATEPAYERS FROM COSTS AND DELAYS
OF THE APPLICATION PROCESS

For a small utility, the contract approval process at the Commission can be extremely challenging and inordinately expensive. Decision 10-03-021 did not mention the process small utilities should pursue for TREC contract approval. For multi-jurisdictional utilities, an advice letter would be required for TREC contract approval if the utility wished to recover the costs of TRECs. Oct. PD at 28.

² A.10-06-003 and A.10-07-012.

As noted in its November 2008 Comments, BVES is required, as long as its price cap is in effect, to file an application for RPS contract approval. *See* D.08-05-029, at 25-26. BVES asked in its November Comments that it be able to use the simpler, less expensive, and speedier advice letter process the multi-jurisdictional utilities may use.

In footnote 102, on page 66 of the Revised Proposed Decision (RPD), the Commission will explicitly grant BVES' request that it be permitted to use the advice letter process.

¹⁰² D.08-05-029 requires BVES to submit an application for approval of bundled energy purchases as long as there is a cap on its electricity charges. This requirement does not apply to TREC purchases. *Underlining added.*

BVES appreciated that its suggestion had been accepted in the RPD. The advice letter process is all that is needed. The application process is expensive and time-consuming. Its requirements necessitate significant investments in management, consultant, and expert advisor time, while the advice letter process has fewer demands and allows for BVES and its counterparty to effectuate the transaction in a more timely manner; therefore, meeting the goals of BVES to procure renewables, the seller/developer to create the TREC and the State to meet renewable goals for cleaner energy. Additionally, there are obvious efficiencies and savings in comparison. The benefit to ratepayers as citizens of the State is clear.

IV.

CONCLUSION

The two RPS contracts BVES has submitted to the CPUC will, if approved, be a significant step forward in BVES' efforts to meet its 20% RPS goal. However, the expense and uncertainty BVES experienced to this point has been unsettling. BVES' small, off-season peak load makes it unattractive to renewable suppliers. The blanket, one-size-fits-all approach favored by the large utilities would be a policy error of

substantial adverse proportions. As such, BVES supports having no cap on its use of TREC's. Too, efficiency and a careful eye to trimming unnecessary costs away from consumer bills strongly commends the advice letter process as the means by which BVES should seek approval of TREC's contracts. There is no reason it should be any other way.

Dated: September 27, 2010

Respectfully submitted,

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APPENDIX

to

COMMENTS OF BEAR VALLEY ELECTRIC SERVICE,
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Findings of Fact

1. Bear Valley Electric Service (BVES), a division of Golden State Water Company, is uniquely situated among California electrical corporations, being located in a mountainous environment, with a winter peaking load that is the inverse of power supply curve in this state, the size and location of BVES make its position relatively unattractive to renewable resource vendors, as compared to the position of the large electrical corporations.

2. A cap on the amount of TRECs available to BVES would not be in the public interest and could have adverse consequences on the ability of BVES to meet the 20% RPS requirement now and in the future.

3. For BVES the flexibility of having contracts for renewable resources as well as no cap on the TRECs that BVES may use to fulfill the RPS requirement is in the public interest and in the interest of maintaining reasonable rates and charges for the BVES ratepayers.

4. The application process for the review and approval of TREC contracts is in the ordinary course less efficient and cost effective than the advice letter process for a small utility such as BVES, with its limited resources relative to the large electrical corporations.

5. It is in the public interest and in the interest of the BVES ratepayers that BVES be permitted to use the advice letter process to present to this Commission TREC contracts for which BVES seeks Commission review and approval.

Conclusions of Law

1. Based on the Findings of Fact concerning the unique position of BVES, there shall be no cap on the TRECs that BVES may acquire to fulfill its RPS requirement.
2. BVES may use the advice letter process rather than the application process to present TREC contracts to this Commission for review and approval.

ORDER

IT IS HEREBY ORDERED, that (A) Bear Valley Electric Service (BVES), a division of Golden State Water Company, shall have no cap on the TRECs that it may acquire to fulfill its RPS requirement and (B) BVES may, in its discretion, use the advice letter process to present TREC contracts to this Commission for review and approval.

CERTIFICATE OF SERVICE

I, Denise E. Lynch certify:

I am employed in the City of Roseville, County of Placer, California, am over eighteen years of age and am not a party to the within entitled cause. My business address is 2999 Douglas Boulevard, Suite 325, Roseville, California 95661.

On September 27, 2010, I caused the following to be served:

COMMENTS OF BEAR VALLEY ELECTRIC SERVICE,
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via electronic mail to all parties on the service list in R.06-02-012 who have provided the commission with an electronic mail address, by electronic mail and First Class mail on Assigned Commissioner Michael R. Peevey, ALJ Anne E. Simon, ALJ Burton Mattson, and by First Class mail on those persons on the service list who have not provided an electronic mail address.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on the date above at Roseville, California.

/s/ Denise E. Lynch

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