BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
07-02-07
02:52 PM

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies	))))	Rulemaking 06-04-009 (Filed April 13, 2006)

COMMENTS OF MORGAN STANLEY CAPITAL GROUP INC. ON JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN ELECTRIC RETAIL PROVIDER GHG REPORTING PROTOCOL

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July 2, 2007

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I. INTRODUCTION

Pursuant to the June 12, 2007 ruling of Administrative Law Judges Charlotte F. TerKeust and Jonathan Lakritz, Morgan Stanley Capital Group Inc. ("MSCG") respectfully submits its comments on the Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol ("Joint Proposal").[1]

As noted by MSCG at Commission-sponsored symposia and in comments filed with the California Air Resources Board ("CARB"), MSCG believes that a source-based greenhouse gas ("GHG") cap-and-trade system is far superior to a load-based system.[2] A source-based system will deliver to California the statutorily mandated reduction in GHG emissions at the least overall cost to end users, and is better equipped to ensure emissions monitoring and compliance. However, the Joint Proposal recommends reporting rules only for a load-based system and

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[1] See Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal, Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies (R.06-04-009) (issued June 12, 2007).

[2] *See* Load-Based v. Source-Based Systems, presented by MSCG at the Commission's *Greenhouse Gas Cap and Trade Systems: Symposium on Linking* (Apr. 19, 2007), *available at* http://www.cpuc.ca.gov/static/Energy/Electric/climate+change/oliviahartridge.ppt; Comments of Morgan Stanley Capital Group in Response to Recommendations of the Market Advisory Board to the California Air Resources Board (filed June 1, 2007) ("CARB Comments").

suggests that California will adopt a load-based market because it is more effective for California than a source-based approach.[3] MSCG respectfully disagrees that a load-based approach is best for California.

Thus, MSCG reiterates its support for a source-based market construct and reserves its right to further comment in this proceeding on market design issues in support thereof. MSCG also urges the Commission to avoid the premature adoption of any GHG market design. With those caveats in place, we will focus the remainder of these comments on the details of the Joint Proposal and will focus on the strengths and weaknesses of this proposal within the context of a load-based approach.

Broadly, MSCG believes that the fundamental concept behind the Joint Proposal is a good effort within the context of a load-based system. We applaud Staff for recognizing the importance of avoiding restrictions on the right to free contract and the potential to add unneeded costs to consumers by removing optionality in dispatch. The key decision in this regard was to develop assigned, default emissions profiles for unspecified resource contracts based on marginal dispatch principles. Given the realities of power system physics, this approach is probably the best that could be done. Even things like E-Tags and the PJM GATS system are, in reality, useful administrative fictions. For a load-based system to have practical (if sub-optimal) functionality, this concept probably has to be at the core. Whichever reporting protocol the Commission adopts will have substantial implications for the final emission burden ascribed to a given retail provider. MSCG commends the Joint Proposal for recognizing this and agrees with

[3] *See* Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electric Retail Provider GHG Reporting Protocol ("Joint Proposal") at 1 n.1, *Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies* (R.06-04-009) (filed June 12, 2007) (acknowledging that the Joint Proposal "addresses reporting rules [only] for a load-based approach," and stating "whether a load-based cap is the appropriate approach will be addressed elsewhere in this proceeding").

its assessment that "[t]he reporting method should not distort the electricity markets by causing retail providers to make non-optimal resource choices."[4]

II. COMMENTS ON JOINT PROPOSAL

A. Reporting Greenhouse Gas Emissions Associated with Electricity Consumption (Joint Proposal, section 1)

1. *Lack of a Comprehensive "Source to Sink" Reporting System (Joint Proposal, section 1.4)*

MSCG agrees with the Joint Proposal that the lack of a comprehensive "source to sink" reporting system in the western United States makes it difficult to assign emissions to load.[5] Moreover, MSCG agrees that generation information systems are currently operational in the NEPOOL and PJM transmission areas which record generation and emissions data from all plants.[6] However, MSCG questions the claim that the NEPOOL and PJM systems are able to "provide information on where most of the electricity generated in these regions sinks, meaning which entity ultimately takes title of the MWh generated and associated emissions."[7] Our research indicates that GATS and NEPOOL-GIS capture the amount of MWh's generated by renewable resources, and then track financial ownership of the various attributes. Ultimately, the rights are assigned to a "sink" and are then used to demonstrate compliance with an obligation and removed from the system. Using an approach like this is certainly a way to administer compliance with a load-based GHG requirement. However, no one should be under the illusion

[4] Joint Proposal at 6.

[5] *Id.* at 2-3.

[6] *Id.*

[7] *Id.* at 3.

that it is anything other than a contractual/financial ownership rights tracking system, not a physical tracking system.[8]

B. Review of Existing Methods for Estimating Resources or Emissions Associated with Electricity Serving California Load (Joint Proposal, section 3)

1. *Regional Marginal (Joint Proposal, section 3.3)*

The Joint Proposal provides a discussion of studies conducted over the past decade that have focused on assessing the fuel types of the resources dispatched to meet California load.[9] The most recent study—conducted in 2007 by California Energy Commission ("CEC") staff—sought to determine fuel dispatch by accounting for all imports from specified sources and conducting a marginal dispatch analysis of the Northwest and Southwest regions for unspecified net imports.[10] The study recognizes the increasing role of natural gas as the marginal resource throughout the West and the role of hydroelectric power as a key resource in the Northwest.[11] The marginal methodology in the staff report would reduce the amount of coal assigned to California load (from 20% to 14%) and increase the amount of natural gas (from 38% to 44%).[12]

MSCG believes this analysis to be fundamentally accurate, and notes that this methodology serves the goal of minimizing interference with industry contracting practices and preserves optionality in dispatch. Both of these actions, in turn, serve to minimize compliance costs for consumers, and optimize the use of society's resources.

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[8] Furthermore, tracking GHG emissions (or the lack thereof) may not be an identical problem. It has some challenges that are loosely analogous to "proving the negative," and is not the same thing as proving that a certain number of MWhs were injected into the system from a qualified renewable resource.

[9] Joint Proposal at 8-10.

[10] *Id.* at 9.

[11] *Id.* at 9, 18.

[12] *Id.* at 9.

C. Categories of Sources (Joint Proposal, section 4)

1. *Specified Sources: Facility-Specific Contracts (Joint Proposal, section 4.1.4)*

The Joint Proposal recommends that conditions be imposed on facility-specific purchases in order for a retail provider to claim the electricity and associated emissions from a specific facility. Such an approach is intended to ensure that power purchased is truly inducing generation from a specified plant.[13] The primary context seems to be a concern over contracting for low-GHG-emitting resources. The Joint Proposal accurately reasons that, "[i]n the absence of any eligibility criteria, contract shuffling is a possible outcome."[14] It recommends "that new claims to existing low- or zero-GHG plants should be treated with some skepticism since there is little reason to believe that an agreement between a retail provider and an existing plant will induce generation that would not have occurred anyway," and provides two suggestions to limit the pool of available clean resources.[15] The Joint Proposal suggests that the situation is analogous to the "additionality" condition that is often used to define offset projects.[16]

One suggestion is to allow claims to facilities within California, provided the retail provider and the independent power producer ("IPP") that operates the facilities contractually agree to these claims.[17] The emission rate assigned to remaining sales of an IPP would be adjusted to remove claimed facilities from its resource mix.[18] A second suggestion is to allow claims to generation from market participants who provide financial backing to new facilities.[19]

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[13] *Id.* at 11.

[14] *Id.*

[15] *Id.*

[16] *Id.*

[17] *Id.* at 12.

[18] *Id.*

[19] *Id.*

While MSCG acknowledges the issue, we ask the rhetorical question, what, aside from contracting with low-emissions resources, can an LSE do to lower its responsible emissions?[20] In a load-based system, all an LSE has control over is its own contracting activities. At best, it can responsibly contract with low emission resources, but it cannot control what resource owners do with capacity or output not contracted to that LSE. This is due to the innately insoluble dilemma of trying to impose a closed system regulatory regime on an open system. As a practical matter, MSCG believes that trying to superimpose an additionality-style vetting requirement for resources physically connected to the system, on top of an aggregate emissions responsibility requirement, is unworkable and that the attempt to do so should be abandoned.

D. Options for Assigning Emissions to Unspecified Sources (Joint Proposal, section 5)

1. *When Emission Factors are Calculated (Joint Proposal, section 5.1)*

The Joint Proposal discusses whether a retail provider's total emissions responsibility should be tabulated *ex post* (*i.e.,* after-the-fact based on actual generation data) or *ex ante* (*i.e.,* in advance based on an estimate fixed at the start of a reporting period), and recommends the State use an *ex ante* calculation.[21]

While adoption of an *ex ante* approach comes with a risk that the presumed emissions rate will differ from the actual emissions rate, MSCG views this to be a commercial necessity. It is difficult to see how market participants could enter into contracts or plan "carbon budgets" if

[20] MSCG is aware that LSEs also may be able to build new resources or implement demand response solutions. However, these solutions are not germane to the discussion of how, and whether to attempt, to require an additionality standard on contracting.

[21] Joint Proposal at 13-14. It posits that "emission factors would need to be calculated from generation, fuel consumption, and emissions data from Year 1 to calculate an emission factor during Year 2 for use in Year 3[,]" and recognizes "the greater certainty afforded by an *ex ante* approach comes at the expense of some accuracy in the factor[.]" *Id.* at 14.

they are to be subject to *ex post* calculations of assigned emissions rates. The market needs the predictability associated with an *ex ante* approach.

2. *Regions for Defining Emission Factors: Asset Owning Entities (Joint Proposal, section 5.2.3)*

The Joint Proposal evaluated several options for assigning emissions to unspecified sources and recommends requiring asset owning suppliers outside of California to either document their sources of power or accept a default rate.[22] MSCG believes this to be reasonable, in context, but notes that there is no discussion about why non-asset owning suppliers should not be given the same option of documenting their actual emissions rates. Furthermore, even with regard to the "asset owning" class, the proposal should be clarified to add "*or controlling*" so that parties to tolling contracts and asset management arrangements have the same option to indicate a power source when, by virtue of a specific agreement, they are, *de facto*, in the same position as actual asset owners.

3. *Calculation of Assigned, Regional Emissions Rates*

The Joint Proposal discusses at length the proper way to calculate regional emissions factors. Issues include average versus marginal emissions, subtraction of "baseload," "claimed" and "specified" resources before calculation, and whether the calculations should be annual or should be broken up into seasonal and/or peak/off-peak calculations. It recommends annual calculations assuming that marginal resources serve California load, and that "baseload," "claimed" and "specified" resources be subtracted from the calculation, while offering parties the option to demonstrate that their actual purchasing patterns differentiate them from the assigned

[22] Joint Proposal at 16.

regional average. MSCG supports this analysis in context and observes that this serves the goal of minimizing disruption of the ability to contract in the most efficient manner.

4. *Determining the Subset of Facilities From a Pooled Purchase that Serves California Load: Marginal Emission Factors for Residual Unspecified Power (Joint Proposal, section 5.3.3)*

The Joint Proposal finds the marginal method to be the most accurate one for calculating regional emission factors.[23] It goes on to assert that "[m]onitoring will be needed to verify whether contract shuffling is occurring at the Northwest hubs." However, the Joint Proposal fails to elaborate on how monitoring would occur or what actions would be taken if such activity is discovered.[24] MSCG reiterates its view that contract shuffling could permeate a load-based system. Thus, as discussed in greater detail below in Section II.E., the Commission should address the issue head-on and in detail and should do so using procedures that allow the market to review the proposed approach and submit comments. However, it also should recognize that its practical options to actually do anything about "contract shuffling" are likely to be limited.

5. *Differentiation by Time of Use: Reporting Options to Capture Seasonal or Time of Day Differences in Emission Rates (Joint Proposal, section 5.4.1)*

The Joint Proposal recommends that retail providers have the option of documenting, prior to a reporting period, that their purchases are significantly different from the regional averages.[25] If so demonstrated, the remaining default rate would need to be recalculated so that the claimed resources no longer appear in the overall factor.[26] MSCG finds this option to be reasonable in principle, but believes it to be problematic from the perspective of the commitment

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[23] *Id.* at 19.

[24] *Id.*

[25] *Id.* at 21, 23.

[26] *Id.* at 21.

to *ex ante* calculations. It remains unclear from the Joint Proposal when a retail provider would have to make this "demonstration" and for what time frames the "adjustments" would be made. Accordingly, if the Commission chooses to adopt this recommendation, it should clarify that adjustments to the individual retail provider's compliance obligation are to be allowed for whatever periods are demonstrated, but make associated adjustments to the regional default emissions rate effective only for the next reporting period. While this is admittedly misaligned and creates a risk of some inaccurate tracking of total emissions, MSCG expects that the practical impact will be minimal and believes the importance of allowing parties to contract based on *ex ante* emissions certainty more than outweighs any downside from misalignment.

6. *Recommendation on Unspecified Sources (Joint Proposal, section 5.7)*

Assuming that a load-based system is implemented and based on the data available, MSCG believes that the Joint Proposal's recommendations for unspecified power are reasonable and supportable.

E. Techniques for Addressing the Potential for Contract Shuffling and Leakage (Joint Proposal, section 9)

The Joint Proposal properly observes the potential for "contract shuffling" to undermine the intent of GHG regulation, and correctly identifies the risk that LSEs may be able to demonstrate full compliance, while having little or no real impact on actual generation dispatch or GHG emissions. MSCG would note that this fact undermines one of the purported advantages of a load-based versus a source-based system. We view the "contract shuffling" dilemma as one of the innate problems of trying to impose a "closed system" regulatory regime on an open system. While we commend the Joint Proposal's efforts, the problem is probably insoluble.

With regard to the specific measures proposed in the Joint Proposal to address the problem, MSCG believes most reflect a disconnect with actual market activity. In a load-based

system the compliance obligation is on load, but the parties apt to engage in "contract shuffling" will be the suppliers. Market participants over which the regulatory agencies have jurisdiction will not be engaging in the undesired activity, while those who may are not jurisdictional. Some of the items in the action plan seem to recognize this, but others seem to be disconnected from this reality. Others items still make vague promises of "action," but do not explain what actions might actually be taken to minimize shuffling. Listed below are some specific observations on each of the individual proposals.

First, although the Joint Proposal recommends that the final rule provide that contract shuffling "is not an acceptable practice and that retail providers will be held accountable," it is unclear how likely it is that a retail provider will know or be able to do anything about most types of contract shuffling. Furthermore, there is no elaboration in the Joint Proposal on what specifically might be done to "hold the retail providers accountable."

Second, even though the Joint Proposal suggests that a state agency would work to ensure stakeholders know that "contract shuffling will lessen the credibility of allowances," this seems to be a pointless exercise. "Credibility" will not exist on a sliding scale. The value of allowances will be completely bimodal. Either allowances will be accepted for compliance and will hold full value, or they will be rejected and thus have zero value.

Third, it is unclear what will be done once regulators learn of contract shuffling, or what regulators will do if they "notice changes in daily and seasonal patterns reflecting greater use of out-of-state baseload resources or increased use of aggregated contracts sold from regional hubs."[27] While this may help in terms of providing inferential evidence regarding the degree of contract shuffling, it is much less clear what might be done about it. Even assuming some

[27] *Id.* at 36.

remedy can be devised, a detailed advance explanation is warranted to make the program work and to give market participants regulatory certainty.

F. Other Issues

1. *Exports*

The Joint Proposal does not explicitly address emissions associated with exports, although there appears to be an assumption that in-state generation resources will be required to report to CARB under some source-based reporting program and it may be that the Joint Proposal assumes exports get addressed in this manner by CARB. Assuming this is true, it remains unclear how emissions associated with exports get separated from emissions associated with in-state consumption for compliance reporting purposes if the emissions originate from the same physical source or resource cluster.[28]

2. *Emissions Cost in the Dispatch*

There is no discussion in the Joint Proposal on how to inject the cost of emissions into the economic dispatch decision. If California is serious about reducing emissions, MSCG believes that the cost of GHG abatement has to be factored into the real-time dispatch decision. The Joint Proposal does not appear to do this.

III. ISSUES RAISED IN THE JOINT PROPOSAL SUPPORT THE CONCLUSION THAT LOAD-BASED REGULATION IS FUNDAMENTALLY FLAWED

The Joint Proposal adds hard substance to MSCG's view that a load-based market design, at best, will be an administratively complex "Rube Goldberg" system. As a side matter, it is axiomatic that the more complex the "rules" the greater the risk of "gaming." Therefore, rather

[28] Although not strictly the subject of this straw proposal, there is another issue raised by this broad question: If allowances are allocated, not auctioned, as some propose, especially if the allocations will be to LSEs, then in the interest of fairness, California must consider whether exporters also should get a share of the allowances and must address how it will determine the number of allowances it will allocate to a generator that is exporting instead of selling in-state.

than rushing to adopt the Joint Proposal's suggested load-based approach, the Commission should consider the benefits of a source-based market design—a design that would be compatible with the RGGI proposal to be implemented in 2009, the existing European Union program, and pending federal GHG legislation.

IV. CONCLUSION

MSCG respectfully requests that the Commission consider the foregoing comments in its consideration of the Joint Proposal.

Respectfully submitted,

/s/

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July 2, 2007

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Comments On Joint California Public Utilities Commission And California Energy Commission Staff Proposal For An Electric Retail Provider GHG Reporting Protocol Of Morgan Stanley Capital Group Inc. on all of parties of record in R. 06-04-009 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission. I also have sent hard copies by overnight mail to the assigned Commissioner, Michael R. Peevy, and the assigned Administrative Law Judges, Charlotte F. TerKeurst and Jonathan Lakritz.

Moreover, pursuant to the June 12, 2007 Administrative Law Judges' Ruling Regarding Comments On Staff Reporting Proposal issued in R. 06-04-009, I have sent one hard copy of these comments by overnight mail to the California Energy Commission and also have sent electronic copies of these comments to docket@energy.state.ca.us and kgriffin@energy.state.ca.us.

Dated at Washington, DC, this 2nd day of July, 2007.

/s/
Adam J. Katz

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