BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking toImplement the Commission's Procurement Incentive Framework andto Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	R.06-04-009

REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN ELECTRICITY RETAIL PROVIDER GHG REPORTING PROTOCOL

Pursuant to the June 12, 2007 "Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal" (ALJ Ruling), DRA submits the following reply comments and on the "Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol" (Joint Staff Proposal).[1]

I. INTRODUCTION

Parties' comments on the Joint Staff Proposal illustrate the complexity, difficulty, and uncertainty facing policymakers tasked with designing an effective greenhouse gas (GHG) emissions reporting protocol that meets the objectives of Assembly Bill (AB) 32. As discussed by most parties, there are a few areas in which the Joint Staff Proposal can be modified to elicit a more accurate and effective reporting protocol that minimizes

[1] Administrative Law Judges' Ruling Regarding Comments on Staff Reporting Proposal (ALJ Ruling), Attachment A: "Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol," (Joint Staff Proposal), June 12, 2007.

gaming and other unintended policy consequences. However, some of the policy considerations and recommendations discussed by parties have potentially far-reaching implications for the scope of the Joint Staff Proposal, and therefore likely require a more granular evaluation in workshops. DRA summarizes its reply comments as follows:

- DRA supports parties' concerns about carefully developing default emissions factors so as to prevent contract shuffling and gaming, which contravene AB 32, CAISO market development, and other policy objectives.

- The Sacramento Municipal Utility District's (SMUD) recommendation to attribute the carbon content of the unit or facility to all deliveries under the contract whether from the specified facility or provided as firming energy should be rejected.

- PG&E's proposed criterion that emissions be reported directly by power plant facilities' managers or first-sellers appears to contradict AB 32 and should therefore be ignored.

- While the First-Seller structure may offer some advantages, the parties supporting it fail to adequately address its risks and shortcomings, and the extent to which it comports with AB 32. A complete evaluation of the benefits and risks of the First-Seller approach and the Joint Staff Proposal's load-based approach as alternative points of regulation should be postponed until the proposed August 21, 2007 workshop on these issues.

II. DISCUSSION

A. The default emission factor for unspecified sources should not be derived using the marginal resource mix methodology.

In its opening comments, the Green Power Institute (GPI) argues that the use of a marginal allocation method for determining the default emission factor for unspecified system imports from the Southwest is wrong from both a *technical* perspective and a *policy* perspective. Specifically, GPI stated that "[i]f the Southwest was not structured to be a net supplier of electricity to California, it would have to serve its own fluctuating load on its own, including supplying peak and partial peak power as necessary, and

would use generating sources that are suitable for providing such service, which is to say, gas-fired for load following, as well as coal for baseload."[2] In other words, Southwest generators shift the dispatch of gas-fired generation to serve the California load while retaining the coal-fired generation to serve native load. This is a classic case of contract shuffling. Moreover, this "power swapping" behavior is consistent with the assumption that "[r]egulated utilities … have the fiduciary obligation to provide electricity to their ratepayers from the lowest cost resources"[3] since coal-fired generation is cheaper than gas-fired generation.

The above scenario however still does not explain CEC's simulation results. The CEC Staff Paper "Revised Methodology to Estimate the Generation Resource Mix of California Electricity Imports" concludes that Southwest exports to California is primarily gas-fired generation based on the simulation results that gas-fired generation declines with little reduction in coal generation when the transfer capability between the California and the Southwest is restricted. However, one can also reason that under the objective of cost minimization/profit maximization, selling the excess coal-fired generation to non-California consumers during the peak period makes better economic sense than shutting down one or more coal units and running natural gas plants to meet the peak load. The simulation results are consistent with this modeling objective.

For the Northwest imports, DRA supports Southern California Public Power Authority with their argument that "the Northwest operates its above-critical-year hydro first to meet native loads, displacing coal-fired generation, and offers the coal-fired generation to the market."[4] Serving native load with nonfirm hydro rather than coal or

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[2] Comments of the Green Power Institute on the Proposed Joint GHG Reporting Protocol, July 2, 20006, p.7

[3] "Revised Methodology to estimate the generation resource mix of California electricity imports", CEC Staff Paper, March 2007, p.7.

[4] Southern California Public Power Authority Comments on Joint California Public Utilities Commission and California Energy Commission Staff Proposal for an Electricity Retail Provider GHG Reporting Protocol, July 2, 2007, p.8.

gas-fired generation would be consistent with the cost-minimizing objective of the regulated utilities. Moreover, as the Northwest states begin to launch their GHG reduction programs, Northwest utilities will want to put claim to their hydro production in order to meet their GHG reduction targets if a load-based reduction scheme is in place. Counting the Northwest nonfirm hydro towards California imports will lead to double-counting of these non-GHG emitting resources.

From a policy perspective, assigning a Southwest default emission factor that is lower than even emissions performance standard adopted in D.07-01-039 (1,100 lbs CO_2/MWh[5]) may encourage Southwest generators to mask their high GHG-emitting resources as an unspecified resource when negotiating power contracts with California load serving entities (LSEs), as pointed out by Calpine in its opening comments. If the Commission desires to eventually create a comprehensive "source to sink" reporting system that tracks both generation and associated emissions, the reporting protocols should reflect this *policy signal* by using a default emission factor for unspecified sources that is higher than 1,075 lbs CO_2/MWh (as derived using the marginal resource mix methodology.) Calpine proposed setting the default emission factor for unspecified resources equivalent to the emission rate of the highest emitting unit in the region. DRA partially agrees with this approach. Rather than using the emission rate of the highest emitting unit as the default emission factor, DRA proposes a slight modification: using the emission rate of the highest emitting unit that is not under contract as the default emission factor for the Southwest region. For the Northwest region, this approach will not be reasonable since there are fewer coal facilities in the Northwest and it would not make sense to assign coal emission rates to Northwest imports. As a middleground approach, DRA proposes calculating the default emission rate for unspecified resources

[5] The 1,100 CO_2/MWH emission rate supposedly reflects the emission rates of both existing and new baseload CCGT units.

using the average resource mix methodology.[6] As given in the Draft Reporting protocol, the eGRID average emission rate for WECC Northwest for 2004 is 921 lbs/MWH.

B. The default emission factor for the CAISO Real Time Market should be at least as high as the default emission factor for the Integrated Forward Market.

The California Independent System Operator (CAISO) and Western Power Trading Forum (WPTF) pointed out that the proposed assignment of default emission factors of 900 lbs/MWH and 1,000 lbs/MWH to the CAISO real time market (RTM) and Integrated Forward Market (IFM) respectively can potentially undermine the "State's effort to move power schedules out of the real-time market and into the forward market"[7], especially when "the IFM is anticipated to be the more optimal market."[8] CAISO further recommended that the emission factors for the RTM and IFM be set at 1,100 lbs/MWH. DRA concurs with CAISO and the WPTF that a higher default emission factor for the IFM may incent buyers to refrain from scheduling a resource in the IFM. DRA therefore agrees that the same default emission factor should apply to both the RTM and IFM in order to eliminate any bias based on the emission attributes of these markets.

C. The Reporting Protocols should track the carbon content of substitute energy separately from that of the renewable resource being firmed

In their opening comments, SMUD proposes that the reporting protocol "attribute the carbon content of the unit or facility to all deliveries under the contract whether from the specified facility or provided as firming energy."[9] SMUD referenced the

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[6] This is a departure from DRA's position in its opening comments, when it recommended modifying the emission factor based on marginal generation. DRA Opening Comments, p. 8.

[7] Comments of the Western Power Trading Forum on the Joint Staff Proposal for Reporting of Greenhouse Gas Emissions by Load-serving entities, July 2, 2006, p.2.

[8] Comments of the CAISO to the Joint CPUC and CEC Staff Proposal for an electric retail provider GHG Reporting Protocol, July 2, 2006, p.4.

[9] Comments of the Sacramento Municipal Utility District on the Joint California Public Utilities Commission and California Energy Commission Staff Proposal, July 2, 2007, p.5.

Commission's Decision D.07-01-039, which allows the use of substitute energy from unspecified resources to firm intermittent renewable resources (solar, wind, run-of-river hydro) for reliability purposes. Specifically, the amount of substitute energy purchases from unspecified resources could be up to the total expected output of the renewable resource under the contract.

DRA agrees with the concept of substitute energy, but D.07-01-039 should not be construed as providing a "carbon-free" pass to the substitute energy. The SMUD proposal contradicts AB32's mandate to "account for greenhouse gas emissions from all electricity consumed in the state." Furthermore, it may create gaming opportunities for suppliers/power marketers to offer "naked" renewable energy contracts with limited renewable facilities to supply the contracted low-carbon energy. DRA recommends that the Commission reject SMUD's proposal and that the carbon emission of unspecified resources used to firm intermittent renewable resources should be calculated and reported in the same way as the carbon emission of system resources.

D. PG&E's recommendation that emissions be directly reported by power plant facilities' managers or first sellers contradicts AB 32.

PG&E proposes to add two new criteria to those listed in Section 2.3 of the Joint Staff Proposal, one of which would assign emissions reporting responsibility to managers of the emitting power plant facilities, or to the first sellers, regardless of the point of regulation:

> First, reporting responsibility should be assigned to parties with the most operational or management control that corresponds to responsibility for implementing health, environmental and safety rules for the facility that is the source of the greenhouse gas emissions that are being reported. This would apply without regard to whether the point of regulation under AB 32 is the retail provider or the first seller, because in either case, direct reporting by

> operators or managers of emitting facilities would be more accurate than indirect reporting by retail providers.[10]

However, AB 32 contemplates the tracking of emissions for all retail sellers of electricity, including LSEs:

> Account for greenhouse gas emissions from all electricity consumed in the state, including transmission and distribution line losses from electricity generated within the state or imported from outside the state. This requirement applies to all retail sellers of electricity, including load-serving entities as defined in subdivision (j) of Section 380 of the Public Utilities Code and local publicly owned electric utilities as defined in Section 9604 of the Public Utilities Code.11

Presuming that the stated requirement to "[a]ccount for greenhouse gas emissions" includes the tracking and reporting of emissions, PG&E's proposed criteria appears to contradict AB 32 and should therefore be ignored.

However, even if PG&E's proposal were consistent with legislative intent, its benefits are dubious. While the line of sight may be clearer and more direct for those with commercial arrangements with the emitting facilities, having all retail sellers report emissions may still be the most cost-effective, comprehensive, and accurate reporting method. In the long run, the use of a comprehensive electronic generation tracking system such as WREGIS or some other regional platform will introduce efficiencies in reporting that may reduce the burden of reporting while increasing accuracy. PG&E's concerns about the point of regulation and added reporting requirements should not preclude the Joint Staff and ARB from weighing the costs and benefits of alternative recommendations. PG&E's proposal should be evaluated in greater depth at the August 21, 2007 workshop on the first-seller and load-based approaches.

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[10] Opening Comments of Pacific Gas and Electric Company on Joint Staff Proposal for a Greenhouse Gas Reporting Protocol Under AB 32 (PG&E Comments), July 2, 2007, at 4.

[11] California Global Warming Solutions Act of 2006 (AB 32), Chapter 3, Section 38530, part (b)(2).

E. The costs and benefits of the "First-Seller structure" need to be more carefully weighed against those of the load-based approach.

Southern California Edison (SCE) and Morgan Stanley Capital Group (MSCG) in their opening comments strongly support the Market Advisory Committee Draft Report's first seller structure,[12] citing its superiority over having the LSE as the point of regulation. Although DRA is not currently taking a position on whether the first-seller structure should be adopted, the Commissions should simply recognize the clear incentive for LSEs and power marketers to support this regulatory approach. That the first-seller structure would impose fewer reporting requirements on LSEs than the load-based approach is not necessarily a cause for concern in and of itself. However, a complete cost-benefit analysis of the two points of regulation has not yet occurred on the record. Additionally, as with PG&E's proposed criteria discussed above, it is unclear whether the first-seller approach is even consistent with the requirements of AB 32. DRA looks forward to participating in the upcoming workshop to explore these critical issues in greater detail.[13]

III. CONCLUSION

For the foregoing reasons, the CPUC and CEC should adopt DRA's recommendations as set forth herein and incorporate them into the final reporting protocol.

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[12] Recommendations for Designing a Greenhouse Gas Cap-and-Trade System for California: Recommendations of the Market Advisory Committee to the California Air Resources Board (MAC Draft Report), June 1, 2007.

[13] A workshop on the first-seller versus load-based approaches is scheduled for August 21, 2007, announced by Julie Fitch of the CPUC's Division of Strategic Planning at the June 22, 2007 workshop.

Respectfully submitted,

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I hereby certify that I have this day served a copy of **"REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON THE JOINT CALIFORNIA PUBLIC UTILITIES COMMISSION AND CALIFORNIA ENERGY COMMISSION STAFF PROPOSAL FOR AN ELECTRICITY RETAIL PROVIDER GHG REPORTING PROTOCOL"** in **R.06-04-009** by using the following service:

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/s/ Imelda C. Eusebio
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