BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
07-26-07
04:59 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 THE COMMUNITY ENVIRONMENTAL COUNCIL ON PHASE II NATURAL GAS PREHEARING CONFERENCE

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PHASE II NATURAL GAS PRE-HEARING CONFERENCE COMMENTS

The Community Environmental Council ("Council") respectfully submits these comments in accordance with the "Joint Administrative Law Judges' Ruling Regarding Comments on Staff Natural Gas Proposal and Notice of Prehearing Conference" ("ALJR"), dated July 12, 2007, and pursuant to Rules 1.9 and 1.10 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure. Our comments focus on the Attachment A preliminary staff recommendations ("Staff Proposal").

The Council is a member-supported environmental non-profit organization formed in Santa Barbara in 1970 and is the leading environmental organization in our region.

In 2004, the Council shifted its primary focus to energy issues and we are spearheading a regional effort to wean our communities from fossil fuels entirely during the next two decades. We are almost unique in combining on the ground work on a number of energy and climate change-related issues with our work on state and federal policy issues. Our state policy work is directly informed by our experience with what has worked, or will work, at the local level. More information on the Council and our energy program may be found at www.fossilfreeby33.org.

I. Schedule and the need for evidentiary hearings

The Council generally supports the proposed schedule in the ALJR. However, clearly the pre-hearing conference has been moved from June to August (and we support this necessary adjustment to take into account time's one-way arrow).

We also urge the Commission to advance the date of the proposed decision from September, 2008, to the earliest practicable date, as it doesn't seem that seven

months will be required between the staff report and the proposed decision. If there is no way to advance this date, it would be helpful to learn why the PD is planned for September of 2008.

The Council reserves judgment regarding the need for hearings at this time, pending comments from other parties and discussions at the PHC. We anticipate there may be some significant disagreements between the parties that may necessitate hearings.

II. General comments

The Council applauds the Commission and staff for their far-reaching recommendations in the Staff Proposal. With non-electricity generation natural gas use projected to comprise fully one-third of Santa Barbara County's energy use by 2030, and approximately 25% of California's energy use (and possibly more if CNG and LNG vehicles catch on), it is highly important that a rigorous natural gas sector regulatory framework be developed.

The Staff Proposal suggests there is a sharp dichotomy between a regulatory (or "programmatic" approach) to the natural gas sector versus a cap and trade approach. The Council would like to point out that a cap has already been set by AB 32 for the state as a whole. It is inconceivable that a cap of some sort won't also be developed for the natural gas sector, under the state-wide cap. Moreover, a programmatic approach to reducing GHGs would surely be linked to desired GHG reduction goals – otherwise known as a cap. Accordingly, it is not entirely accurate to speak of a programmatic approach and a cap and trade as though they are distinct. A programmatic approach would also entail a cap, but would have prescriptive programs for achieving the cap, whereas a cap and trade approach would allow market mechanisms to achieve the cap.

Moreover, cap and trade and programmatic approaches are not the only approaches available. The Council is nearing completion of a study comparing cap and trade to carbon taxes as options for achieving significant GHG reductions. We understand that it is not the role of the Commission to impose a tax across the natural gas sector – though the Commission may in fact have authority to impose a "fee" on utility customers just as it imposed an additional fee for the California Solar Initiative pursuant to its existing regulatory authority in 2006.

The Climate Action Team's 2006 report states with regard to a carbon fee, described as a "fee-based option":

> Fee-based options exist and merit further evaluation but have not been fully explored at this point. The primary attractiveness of such programs is that they can be centrally managed and can be targeted towards the largest sources or broadly targeted at energy sources at point of origin or as close to point of origin as possible. Proceeds could be used to provide incentives or otherwise fund emission reduction projects. (P. 82).

The Climate Action Team report recommended not pursuing a fee-based option because it "could not guarantee" reductions and the necessary outreach to stakeholders had not been conducted. The Council believes that no regulatory or legislative approach can "guarantee" reductions. However, AB 32 set a cap for the state, so the real issue is: what is the most effective way to achieve reductions? Many economists and analysts are now chiming in with a carbon tax or fee as the best answer.

Regardless of whether the Air Resources Board uses its authority under AB 32 (Health & Safety Code § 38597 allows a fee to be imposed, though there is some

controversy as to the extent of this fee authority), or the Legislature at some point makes it clear that a carbon fee will be used as a GHG reduction tool, the Commission should in this proceeding examine the merits of a carbon fee on natural gas as a regulatory tool.

The merits of a carbon fee approach are many, including much simpler administration when compared to a cap and trade system largely due to the ability to impose the carbon fee on the first seller of natural gas (or natural-gas fired electricity), coal (or coal-fired electricity) or petroleum; vastly reducing the inherent volatility of a cap and trade market; reducing the potential for manipulation of carbon markets; and others. When we consider that the Legislature could also reduce taxes or fees in other areas, this carbon fee could become revenue neutral. This feature should ameliorate any reflexively anti-tax responses to discussion of a carbon fee as a tool for reducing GHGs. And when we consider that a cap and trade system will functionally impose a fee or tax on consumers, the reflexive anti-tax arguments ring even more hollow.

Last, our draft policy paper states:

> It is interesting to note that California excludes any consideration of an alternative model that is becoming preferred over cap-and-trade models by a majority of economists[1], major newspaper editorials[2], and a wide spectrum of policy advocates - ranging from oil industry giant Exxon, the

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[1] Wall Street Journal, "Is it Time for a New Tax on Energy?" By Phil Izzo, February, 9 2007, http://online.wsj.com/article/SB117086898234001121-search.html?KEYWORDS=Phil+Izzo%2C+Is+it+time+for+a+new+tax+on+energy%3F&COLLECTION=wsjie/6month

[2]- Los Angeles Times, Editorial; "A Warming World; Cool and Collected; A carbon tax is the best, cheapest and most efficient way to combat cataclysmic climate change. May 28, 2007.
- Washington Post, Editorial, "Some Positive Energy; Now Start Talking About a Carbon Tax", Monday, June 25, 2007, http://www.washingtonpost.com/wp-dyn/content/article/2007/06/24/AR2007062401331.html?sub=new
- New York Times, Sunday Magazine Cover Story, "The Power of Green" by Thomas Freidman, April 15, 2007.

right of center policy think tank American Enterprise Institute, to former vice-president Al Gore[3]?

III. Specific Comments

The Staff Proposal states, correctly, that the 2006 California Gas Report projects an average annual growth in natural gas demand of 0.5% through 2025. However, it's important to note that the Gas Report projects flat demand through 2016, due to energy efficiency and renewables substituting for natural gas (among other factors). After 2016, the report assumes a return to the status quo, and thus a resumed increase in natural gas demand from 2016 to 2025. With what we know about climate change – and the passage of AB 32 – not to mention "peak oil" and gas concerns over the next decade, it is practically inconceivable that the status quo will be maintained after 2016. Accordingly, it is highly unlikely that the 0.5% annual increase in demand through 2025 will materialize.

As a factual note, methane has a higher global warming potential ("GWP") than 21, as is stated on page 8 of the Staff Proposal. The Intergovernmental Panel on Climate Change's Third Assessment Report states that the GWP of methane is 62 after 20 years and 23 after 100 years, falling to 7 after 500 years. It would seem prudent to include in the Commission's calculations a GWP more in keeping with the 20-100 year timeframe than the multi-centennial timeframe the Staff Proposal currently uses.

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[3] - The Australian, Business Section, "Exxon Advocates Tax Over Carbon Trading", by Andrew Trounson, March, 21 2007, http://theaustralian.news.com.au/story/0,20867,21418225-643,00.html?from=public_rss
- American Enterprise Institute for Public Policy Research, Environmental Policy Outlook, "Climate Change: Caps vs. Taxes", by Kenneth P. Green, Steven F. Hayward, and Kevin A. Hassett, June 2007, p.11, In concluding the report asserts "if aggressive actions are to be taken to control GHG emissions, carbon-centered tax reform - not GHG emission trading - is the superior policy option."
- Carbon Tax Center, "supporters", available at http://www.carbontax.org/who-supports/ comments from Al Gore's remarks to U.S. Congress in March 2007.

Page 9 of the Staff Proposal states that the quality of natural gas in California is "very uniform" and that as a consequence greenhouse gas emissions are the same across the board for natural gas used in California. This is an accurate statement today, but as soon as LNG becomes available in California, either through the Sempra Baja terminal, or some other terminal, this statement will probably not be accurate because LNG can contain more "hot gas" than domestic natural gas, and have a consequently higher greenhouse gas impact.

The Staff Proposal also states that the "two primary ways to affect end user consumption" of natural gas are conservation and energy efficiency. While we fully recognize the potential and merits of conservation and energy efficiency, there is at least one other primary means for affecting end user consumption: renewable energy. More specifically, solar hot water has a direct impact on natural gas end-user demand in homes and businesses. With AB 1470 – which would provide subsidies for solar hot water similar to what is available for solar PV – poised for passage in the Legislature, we are likely to see an upsurge in solar hot water installations in our state, exerting potentially substantial impact on natural gas end user demand through reductions in natural gas consumption for water heating. While solar hot water installations currently cost more than energy efficiency and conservation (which is by definition free), it is likely that solar hot water costs will come down significantly over time. Accordingly, the Staff Proposal should include discussion of solar hot water.

The Council applauds the Staff Proposal inclusion of biogas. This is a potentially significant source of natural gas for power generation. We also agree that it will not reduce GHG emissions from the natural gas sector, but will reduce methane emissions overall, achieving a large net benefit. We urge the staff to also discuss offshore methane seeps. In Santa Barbara County, Venoco, Inc., collects significant amounts (300-500,000 cubic feet per day) of natural gas that seeps

naturally from the ocean floor, in large "seep tents." The Council is not aware of any statewide survey of methane seep potential, but it should be considered as another alternative source of natural gas.

The Council appreciates the staff mentioning as an issue "whether to regulate emissions associated with upstream transactions (such as extraction, gathering, and processing of natural gas)." As the Council has opined previously in this proceeding, not all natural gas is created equal. In particular, lifecycle emissions analysis shows that GHGs from LNG can be much higher than for domestic natural gas.[4] While we understand that the Commission has decided to not discuss lifecycle emissions for power generation in this phase of the proceeding, we urge the Commission to revisit this issue as soon as possible because the impact of LNG supplies in California will be substantially higher than for domestic natural gas and these additional emissions should be accounted for if we are honest about California's impact on global climate. This issue will affect both the electricity sector and the natural gas sector.

The Staff Proposal states: "Another element of defining the scope is to determine which greenhouse gases are being regulated." (P. 12). The Council urges the Commission to include methane regulation in this phase of the proceeding – at least for the natural gas sector. As the staff point out, there are significant fugitive emissions from the natural gas infrastructure and if methane is not included in the regulatory scope, alternative sources of natural gas such as dairy gas or methane seeps will have no role to play because they only reduce the net methane emissions, not net carbon dioxide emissions.

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[4] Jaramillo, P., Griffin, M., et al., "Comparative Life-Cycle Air Emissions of Coal, Domestic Natural Gas, LNG, and SNG for Electricity Generation," Environmental Science & Technology, published online July 25, 2007. Abstract available at http://pubs.acs.org/cgi-bin/abstract.cgi/esthag/asap/abs/es063031o.html.

The Council agrees that all the issues listed on page 12 of the Staff Proposal should be considered in this proceeding: the scope of regulatory authority; the effectiveness of potential regulation; the structure of the natural gas market; and the feasibility of regulating individual retail customers. On this last issue, we mention as a preliminary note that the idea of "personal carbon trading" is catching on in the European Union, being promoted by a number of non-profits in Europe.[5] Under such a system, each person would be allocated allowances and could sell such allowances if they are not used. This clearly is not something the Commission would have authority to initiate, but it is worthy of discussion in this proceeding as the Commission may wish to recommend such an approach to the Legislature.

IV. Comments on Staff Recommendations

In section VI of the Staff Proposal, staff makes a number of general recommendations.

- Recommendation #1: the Council fully supports this recommendation. If a cap and trade system is imposed on the electricity sector, it should also be imposed on the natural gas sector.

- Recommendation #2: the Council also wholeheartedly supports this recommendation as it would be toothless to regulate the natural gas sector without regulating end use combustion. It will also be necessary to regulate fugitive emissions, as staff recommends, if methane is included as a regulated GHG.

[5] "Cap and Share" is one such program being promoted by the Irish group FEASTA: http://www.capandshare.org/.

- Recommendation #2(a): the Council reserves judgment on this issue pending further reflection.

- Recommendation #2(b): the Council agrees that natural gas used for electricity generation should be regulated as part of the electricity sector. However, we note, in line with our above comments on the merits of a carbon tax vs. cap and trade, that such distinctions are eliminated under a carbon tax system because the point of regulation would likely be the first seller of natural gas, regardless of what the natural gas is used for. Similarly, the point of regulation for coal would be the first seller of coal and the point of regulation for petroleum would be the first seller of petroleum.

- Recommendation #2(c): The Council reserves judgment on this recommendation until a later date. We reiterate, however, our previous statement that such distinctions fall away under a carbon tax approach.

- Recommendation #2(d): The Council agrees that under a cap and trade system, natural gas used for transportation should be regulated as part of the transportation sector. Again, under a carbon tax system, this distinction falls away.

- Recommendation #2(e): The Council agrees that under a cap and trade system, infrastructure emissions associated with natural gas should be the responsibility of infrastructure providers. At the risk of sounding like a broken record, under a carbon tax system, this distinction falls away because the first seller is the point of regulation for all natural gas supplies.

- Recommendation #3: The Council also supports examining distributed generation and combined heat and power in this proceeding. It is not clear if staff is recommending examining these issues in this phase of the proceeding, but the Council urges the Commission to do so.

Respectfully submitted,

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Dated: July 26, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have served by electronic service a copy of the foregoing PHASE II NATURAL GAS PREHEARING COMMENTS OF THE COMMUNITY ENVIRONMENTAL COUNCIL on all known interested parties of record in R.06-04-009 included on the service list appended to the original document filed with this Commission. Service by first class U.S. mail has also been provided to those who have not provided an email address.

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