



**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)

**PILOT POWER GROUP, INC.'S COMMENTS ON TRADABLE RENEWABLE
ENERGY CREDITS**

Pilot Power Group, Inc. (“Pilot Power”) respectfully submits its Comments on Tradable Renewable Energy Credits (“TRECs”). These comments are timely filed and served on the service lists for Order Instituting Rulemaking (R.) R.06-02-012, R.06-05-027, R.06-03-004, and R.06-04-009, pursuant to the Administrative Law Judge’s ruling issued in this proceeding on October 16, 2007.

INTRODUCTION

Some of the discussion regarding tradable RECs has revealed an apparent belief on the part of some that RECs are somehow a new, different or unique product. In reality, however, RECs are not new and have been in use in California for RPS compliance since the inception of the RPS program. The current manner in which the IOU’s achieve their RPS compliance in California is through both bundled and unbundled renewable energy products. In the Staff White Paper regarding Renewable Energy Certificates And The California Renewables Portfolio Standard Program (the “White Paper”) compiled and submitted in this proceeding last year by Staff of the Energy Division, Staff noted:

The Commission has already adopted rules that allow renewable energy delivered anywhere in the CAISO control area to count toward a given IOU's RPS obligations, thus facilitating the implicit use of RECs within California. An unbundled/tradable REC regime could leave these eligibility requirements unchanged...

White Paper, pp. 87-88. In D.05-07-039, this Commission changed the delivery requirements for renewable energy such that RPS qualifying energy need not be delivered into the service territory of the purchasing IOU, but must only be delivered into the CAISO control area. The IOU is then allowed to arrange for delivery of the renewable energy into its service territory, or may unbundle the energy from the renewable attributes and resell the energy, while keeping the renewable attributes for RPS compliance purposes. White Paper, pp. 4, 12; D.05-07-039, pp. 9-10. As correctly concluded by the Staff, this implicitly authorizes the use of unbundled RECs for RPS compliance by the IOUs.

Simply stated, RPS qualifying renewable energy consists of two components: 1) the electric energy; and 2) the renewable/environmental attributes of the energy (a "REC"). The energy is indistinguishable from energy created from any other fuel or generation technology. Electric energy is electric energy--no matter how generated. What is required to satisfy RPS program standards is not electric energy, but renewable/environmental attributes of energy generated by qualifying renewable facilities. When an LSE purchases a bundled energy and renewable attributes product, that energy is generated and scheduled for delivery to designated locations for consumption. The energy is consumed virtually the moment it is generated. The consumption of the energy affects an unbundling of the energy from the renewable attributes of the energy. Months later—long after the energy has been consumed and no

longer exists—the LSE then uses the environmental attributes in its RPS report(s) to satisfy its RPS obligations. In fact, the LSE can bank excess environmental attributes to satisfy RPS obligations in future compliance periods—years after having unbundled the environmental attributes from the energy.

The advent of a tradable REC regime simply addresses the timing of when the renewable/environmental attributes (the REC) can be unbundled, and by whom. Currently, the Commission allows LSE's to purchase bundled renewable energy; the LSE can then unbundle the energy and the renewable attributes and sell the energy while retaining the renewable attributes for RPS compliance. Under the proposed tradable REC regime, the Commission would permit any party, including the generator or first seller to unbundle the energy and the renewable attributes and sell them separately. The energy is sold as energy (without any special attributes), and the renewable/environmental attributes (the RECs) are sold to satisfy RPS compliance obligations. Who does the unbundling does not affect in any manner the electric energy or the renewable/environmental attributes. A REC is a REC regardless of when it is unbundled from the associated energy. The renewable/environmental attributes of a tradable REC are exactly the same as the renewable/environmental attributes of an equal volume of bundled renewable energy—strip away the energy through unbundling or through consumption, and you are left with the identical renewable/environmental attributes.

Understanding that a REC is identical to and consists solely and completely of the renewable/environmental attributes of bundled renewable energy, means that implementing a tradable REC regime does not require the creation of a special set of rules. In virtually all circumstances, the same rules can and should apply. For example,

with regard to RPS minimums, an LSE should be able to satisfy its RPS minimums during a given compliance period from: 1) long-term bundled renewable energy contracts; 2) long-term REC contracts (e.g., a forward contract for RECs generated over a period of 10 years or more); 3) bundled renewable energy contracts with new facilities; or 4) REC contracts with new facilities. Any combination of qualifying bundled renewable energy and/or REC contracts should satisfy RPS minimums. Once satisfied, the LSE should then be able to count toward its RPS obligations any short term contract, whether for bundled renewable energy or for RECs.

The unity of bundled and unbundled RECs should inform every aspect of the RPS program and the tradable REC regime.

SPECIFIC QUESTIONS FOR CONSIDERATION

1. Basics of a tradable REC market

(1) Of the following statements from Attachment D, please agree or disagree with each, and provide justification based on specific experiences and/or economic analysis.

(b) Tradable RECs will provide buyers and sellers of RPS-eligible generation with additional contracting flexibility in the near term and long term.

It is indisputable that TRECs will provide additional contracting flexibility. TRECS provide California's buyers and sellers of RPS-eligible generation with another product/option that can be used to satisfy California's RPS requirements for 2010, as well as any future requirements.

(c) Tradable RECs will facilitate RPS compliance for small LSEs, but will only marginally affect large IOUs' RPS compliance in the near term (i.e. until the 20% target is reached).

Pilot agrees that TRECs will help to facilitate compliance for small LSEs. However, TRECs are likely to affect all LSEs equally in the near term and long term. There is not currently enough RPS-eligible generation for all LSEs to satisfy California's RPS requirements by 2010. Thus, all LSEs, including IOUs, will be in the market for any and all types of RPS-eligible products, including RECs.

- (d) Given the stringent RPS targets and limited supply of surplus renewable energy in the near term (at least until the 20% target is reached), the California REC market would reflect a supply and demand imbalance.

All commodities are subject to supply and demand price signals, including RECs. Thus, until the market supply can meet demand, there will be a market imbalance. As stated above, there is not currently enough RPS-eligible generation (i.e., supply) for all LSEs to satisfy California's RPS requirements (i.e., demand). Thus, there will be a supply imbalance for both bundled renewable energy and RECs.

- (3) Please revisit the following two issues discussed in pre-workshop comments in light of the presentations and discussion at the workshop:

- (a) How, if at all, would REC trading, as compared to the current firming and shaping rules for delivery of RPS-eligible power into California, provide more flexibility or be less costly for procuring out-of-state renewable energy? Please provide specific examples of situations in which REC trading would enable procurement of energy from new renewable resources located outside of California and delivering energy into California that would not otherwise be possible.

REC trading would eliminate the need to firm and shape RPS-eligible power for delivery into California. Buyers of renewable energy could instead purchase TRECs from any qualifying facility, avoiding the hassle and expense of firming and shaping the power. Transmission constraints and line losses can make it impractical to procure, wheel and serve out of state renewable power to many parts of California. REC trading avoids the need to swap energy with another supplier or LSE to get power where it is needed.

- (b) How, if at all, would REC trading, as compared to current RPS flexible delivery rules, provide more flexibility or be less costly in overcoming transmission congestion constraints? Please provide specific examples of situations in which REC trading would enable renewable energy projects to be developed in transmission constrained areas in California that would not otherwise be feasible.

California needs to incent new generation within constrained zones. REC trading allows power to be sold and consumed locally (avoiding transmission constraints), but RPS credits to be sold and distributed anywhere in the state. As noted above,

REC trading allows an LSE to avoid the hassle and cost of finding another party to swap with in order to move power from a constrained zone where the LSE may not have load to another location where the LSE has load. Instead, the LSE can avoid the swap transaction and simply purchase energy elsewhere for delivery into the zones in which the LSE has load. Nevertheless, although the LSE may not have load within a constrained zone in which a renewable project is located, the LSE could purchase RECs for RPS compliance. This is a significantly more efficient model to address two needs: the need to reduce transmission constraints, and the need to procure products satisfying RPS obligations.

- (6) If demand for tradable RECs for RPS compliance exceeds supply in the California REC market (at least in the near term), do you agree with Dr. Weiss's analysis that REC prices would tend to float to the RPS penalty amount (\$50/MWh)? Would prices float to any other price cap the Commission might implement?

Yes. Market forces necessarily dictate that if demand for TRECs exceeds supply, sellers of TRECs will set the price as high as a buyer is willing to pay. Buyers, necessarily, will be willing to pay whatever price necessary to meet RPS compliance, up to the penalty amount. The price of TRECs could therefore float to the RPS penalty amount. For this reason, there must be a waiver price set that is significantly lower than the penalty amount.

- (a) If REC prices floated to the penalty amount or a price cap, would a market for tradable RECs drive up the price of bundled RPS contracts?

As stated above, there is not enough RPS qualifying energy, bundled or unbundled. Thus, scarcity will drive up the price of both. If bundled energy prices floated to a waiver/penalty amount or a price cap, it is probable that such an occurrence would drive up the prices of RECs. If RECs are too expensive, parties will attempt to buy bundled energy. Similarly, if RECs garner a greater premium than the premium on an equal amount of bundled energy, sellers undoubtedly will unbundle their renewable energy to cash in on the high REC prices. Once this occurs, RECs will be less scarce and REC prices will decrease. However, as noted above, there is not sufficient renewable energy in the region to satisfy the legislatively mandated 20 percent requirement. This inelastic and artificial demand is what will drive up the cost of both bundled RPS contracts and REC prices.

2. Staff straw proposal

Market Participants:

Pilot agrees there should be no limit on market participation.

TREC Usage Limits:

*It appears that the Straw Proposal recommends that short term REC contracts should count for RPS compliance only if in the same calendar year the LSE signs long-term **bundled** contracts or **bundled** contracts with new facilities. As noted above, there should not be one set of rules for bundled contracts, and a separate set of rules for RECs. RECs are simply the renewable/environmental attributes of renewable energy generated at RPS qualifying facilities—no more, no less. RECs are co-equal and co-extensive with the renewable/environmental attributes of bundled renewable energy. Thus, pursuant to the rules for RPS minimums, short-term bundled contracts and short-term REC contracts should only count if the RPS minimums have been satisfied. However, those minimums should be satisfied from any combination of long-term bundled contracts, long-term REC contracts, bundled contracts from new facilities, or REC contracts from new facilities. Different rule formulations for bundled energy contracts and RECs unnecessarily complicates the RPS program. There should be one set of rules that applies across the board for bundled and unbundled energy.*

Flexible Compliance: Banking:

Banking and borrowing must be permitted within reasonable limitations. Pursuant to D.03-06-071, this Commission established banking and borrowing rules for the IOUs with respect to their RPS procurement. In short, the IOUs are allowed to “bank” over-procurement to be applied to any later compliance period. In addition, the IOUs are allowed to “borrow” up to 25% of their incremental procurement targets without Commission authorization, and borrow in excess upon showing sufficient extenuating circumstances. Borrowing shortfalls must be made up within three years of when they occurred.

As noted in the Introduction above, a TREC is no different than the renewable/environmental attributes of bundled renewable energy. This is especially apparent when considering the flexible compliance rules. Under the current rules, IOUs are allowed to bank indefinitely the renewable/environmental attributes of renewable energy. Thus, many years after renewable energy has been generated and consumed (consumption of the energy effects an unbundling of the renewable attributes from the electric energy), the IOUs are allowed to utilize (or retire) the renewable/environmental attributes of the previously consumed renewable energy. What is banked is not the energy which was consumed almost immediately after being generated, what is banked is the attribute (the REC that was unbundled at the time the electric energy was consumed). What is used for later compliance filings is not the energy (which was consumed in a prior compliance period) but the renewable attribute (the REC).

It should not matter “when” the REC is unbundled from the associated electric energy. Whether the REC is unbundled at the time it is sold, or is unbundled when the associated energy is consumed, the effect is identical—qualifying renewable energy has been generated, the electric energy has been consumed, and the REC (the renewable/environmental attributes) is used (retired) to satisfy RPS compliance obligations at some later point in time. The banking and borrowing rules should apply equally to bundled renewable energy sales and to sales of unbundled RECs. It makes no sense to treat renewable attributes unbundled at the time of consumption different than renewable attributes unbundled at the time of sale.

The Straw Proposal does, in fact, provide for indefinite banking of TRECs for compliance purposes. However, the Straw Proposal recommends that there be a three year limit on the tradability of TRECS. In essence, after three years, the REC cannot be sold but can only be used for RPS compliance. At first blush this appears a reasonable compromise between those desiring unlimited forward banking, and those favoring a limit on banking of RECs. However, given that load migration does in fact occur, and given that LSEs can and do enter and depart from the California market, the proposed three year limit on trading could work a significant hardship on an LSE. Suppose an LSE enters into a long term REC contract or otherwise purchases a significant amount of RECs in excess of its current need (since the 20 percent requirement is looming on the horizon, it would be a prudent action for an LSE to acquire as much qualifying RPS energy or RECs as possible) with the intention of banking the excess for future compliance periods. Further assume either that the LSE loses significant load through migration, or decides to depart the California market. If three years has passed since purchasing the RECs, the LSE would not be able to re-sell the RECs into the market. The LSE would not be able to use them and would lose significant amounts of money. Moreover, the RECs would be lost from the market—a market that already does not have enough qualifying RPS products. Thus, other LSE’s would lose the ability to acquire the unneeded RECs, making it more difficult for them to satisfy their RPS obligations.

Pilot Power respectfully requests that the Commission consider not only unlimited forward banking of RECs, but also unlimited tradability. If the Commission is concerned that market manipulation could be attempted by a supplier hoarding RECs, then Pilot Power respectfully suggests that the three year trading limit apply only to non-LSEs. With regard to LSEs, Pilot Power suggests that there should be unlimited banking and tradability.

Flexible Compliance: Earmarking:

The Straw Proposal suggests that TRECs not be used for earmarking. As noted throughout these comments, RECs should not be treated differently than bundled contracts. The renewable/environmental attributes of a bundled contract are what constitute a REC. By definition, they are the same. RECs should be available for earmarking the same as bundled contracts.

The rationale in the Straw Proposal for excluding RECs from earmarking is 1) it creates an unnecessary administrative complexity because few REC contracts for new facilities will be expected, and 2) it would not be feasible to assess the viability of underlying energy projects that have not been submitted to the Commission.

If there are few expected REC contracts from new facilities, then there is little or no administrative burden to justify not allowing earmarking for RECs. There should not be one set of rules for RECs and another set for bundled contracts. If the Commission has to review the project viability of underlying energy projects to approve earmarking for a bundled contract, then the Commission will likewise have to review the project viability of underlying energy projects to approve earmarking of RECs. If the underlying project has not been reviewed and approved by the Commission, it cannot approve earmarking of either bundled contracts or RECs. If the underlying project has been reviewed and its viability approved by the Commission, then both bundled contracts and REC contracts can be approved for earmarking.

Amusingly, footnote 6 of the Straw Proposal states: “For example, if an IOU buys a REC from a trader, the Commission will not know which facility generates the energy associated with the REC.” This is somewhat absurd. It would be similar to someone making the argument that “if an IOU buys bundled energy from a trader, the Commission will not know which facility generates the energy.” A contract for RECs is directly tied to the renewable energy generated at a specific facility (similar to Resource Adequacy capacity which is unit specific)—otherwise it is useless. Likewise, a bundled contract is tied to a specific facility—otherwise it is useless. Moreover, if the Commission has to review the viability of the underlying energy project, then the Commission will know exactly which facility is at issue.

There appears no good reason why earmarking should not be available for REC contracts as well as for bundled contracts.

Dated: November 13, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served, this day, a copy of the foregoing **PILOT POWER GROUP, INC.'S COMMENTS ON TRADABLE RENEWABLE ENERGY CREDITS** to all known parties of record or their attorneys in this proceeding by delivering a copy via email on the service list for Rulemaking R.06-02-012, R.06-05-027, R.06-03-004, and R.06-04-009, attached hereto as Exhibits "A" through "D".

Executed on November 13, 2007, at San Diego, California.

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