BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Develop Additional Methods to Implement the California Renewables Portfolio Standard Program.	Rulemaking 06-02-012 (February 16, 2006)

TURN'S POST-WORKSHOP REPLY COMMENTS ON TRADABLE RENEWABLE ENERGY CREDITS (TRECs)

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In accordance with direction provided by ALJ Simon in her Rulings of October 16, 2007 and November 21, 2007, the Utility Reform Network (TURN) files these replies to post-wokshop comments concerning the use of tradable renewable energy credits (TRECs) for compliance with the California Renewable Portfolio Standard (RPS).

I. Reply concerning TREC prices and Ratepayer Impacts

Several parties agreed with Dr. Weiss' assertion that the noncompliance penalty (NCP) will set a price cap for tradable REC prices. The Commission has adopted a noncompliance penalty of $50/MWH in D.03-06-071, subject to potential excuse for non-compliance based on several exonerating factors.

However, both SCE and PG&E challenged the assumption that the NCP will form a cap on prices utilities would be willing to pay for TRECs.

SCE argued that a utility would be willing to pay *any price* for unbundled RECs in order to avoid shareholder penalties.[1] If a REC purchase could achieve compliance, SCE claims that it would obviously spend any amount of ratepayer money on a REC to avoid shareholder penalties. TURN does not disagree with this claim, but notes that such a REC purchase should still meet a reasonableness standard, depending on rules adopted for evaluating short term versus long term REC purchases.

SCE also explained that if the proposed $35/REC cap on cost recovery was adopted, the utility would pay up to $84.99 for an unbundled REC to avoid the $50 shareholder penalty for noncompliance, since this amount would still reduce shareholder

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[1] SCE Post-Workshop Comments, p. 13. See, also, SCE at pp. 13-16.

exposure.[2] SCE thus concludes that "it is therefore reasonable and likely that the price for near-term unbundled RECs could exceed the price for bundled renewable energy and could exceed the $50 interim penalty rate adopted by the Commission, because, unlike bundled RECs from projects which remain to be developed, RECs can be purchased from existing facilities and used for RPS compliance now."

SCE lays the blame for this somewhat unexpected outcome on the nature of the shareholder penalty mechanism adopted in D.03-06-071 and suggests that an Alternative Compliance Payment scheme would better align ratepayer and shareholder interests and provide funds to support new renewable procurement. SCE's assertions and conclusions ignore the mechanisms of excusing noncompliance penalties adopted by the Commission, ignore statutory cost control measures, and ignore the impacts of both SB 107 and SB 1036. Nevertheless, the outcome posited by SCE could occur and is one of the huge drawbacks of authorizing the use of TRECs for RPS compliance.

Consistent with the RPS statute, the Commission early on specified that noncompliance penalties may be excused for several justifiable reasons.[3] When Edison complained that a shortfall should be excused after paying penalties in one year, the Commission stated:

> Nonetheless, SCE's example is incomplete, and thereby not compelling. It fails to address any of the many ways a penalty may be deferred or waived (e.g., insufficient response to a solicitation, earmarking, inadequate public goods funds, seller non-performance, lack of effective competition, promotion of ratepayer/program interests, showing of good cause). That is, upon a convincing

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[2] In other words, shareholders might absorb the 49.99 in above cap costs, while otherwise shareholders would pay $50 in penalties.

[3] See, D.03-06-071, pp. 50-55; See, also, D.05-07-039, Ordering Paragraph 14; D.06-05-039, p. 28-29; D. 06-10-050, pp. 31, 37, 41. Flexible compliance rules have been adopted for the years prior to 2010.

> showing of any of several reasons, neither the $25 million, nor the $150 million total, would be assessed.[4]

This same response applies also to Edison's conclusions regarding TREC prices. TURN cannot help but assume that a TREC price of $84.99, almost the level of the MPR for bundled renewable power, is unreasonable and would reflect a lack of competition and harm to ratepayers.

SCE is also ignoring the impact of both SB 107, which became effective January 1, 2007, and SB 1036, which was signed into law just this past October. The statutory provisions modified by these two pieces of RPS legislation (specifically §399.15(d) and §399.16(a)(8)) provide limits on renewable power costs and REC purchases, and flexible compliance rules could allow the utility to protect ratepayers before paying unreasonable costs for either bundled power or RECs.[5]

Section 399.15(d), as recently modified by SB 1036, defines the cost cap for above market costs as equivalent to the amount that was previously collected for the Supplemental Energy Payment program.[6] Section 399.15(d)(3), as modified by SB 1036, mandates that "the commission shall allow the electrical corporation to limit its procurement to the quantity of eligible renewable energy resources that can be procured

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[4] D.06-10-050, *mimeo* p. 41.
[5] SB 107, modifying §399.14(a)(2)(C)(i), mandates that flexible compliance rules shall apply "to all years, including years before and after a retail seller procures at least 20 percent of total retail sales." The Commission stated that it would adopt flexible compliance rules for 2010 and beyond implementing this new language. D.06-10-050, *mimeo* p. 29-30.
[6] See, §399.15(d)(1), codifying provisions of SB 1036 (Perata, Chapter 685, Statutes of 2007).

at or below the market prices" established by the Commission.[7] In other words, if renewable project costs *increase* such that the utility exhausts the above-market costs it may be excused from meeting the 20% target.[8]

Section §399.15(d)(2)(D) stipulates that the costs of renewable energy credits do not count as above-market costs, so that utilities cannot utilize funds available for above-market costs to pay for RECs. Moreover, §399.16(a)(8), originally adopted in SB 107 and modified in SB 1036, mandates that:

> No electrical corporation shall be obligated to procure renewable energy credits to satisfy the requirements of this article in the event that the total costs expended above the applicable market prices for the procurement of eligible renewable energy resources exceeds the cost limitation established pursuant to subdivision (d) of Section 399.15.

The effect of §399.16(a)(8) is to excuse the utility's obligation to meet the 20% RPS requirement through the purchase of RECs if the utility has already exhausted the funds collected to meet above-market costs for long-term bundled renewable power.

It is possible that the LSEs, even including the IOUs, will not meet their 20% by 2010 requirement for actual deliveries due to failure or delay in renewable project development, even though the utilities might have signed sufficient long-term contracts to achieve 20% on paper. The fear of noncompliance penalties could motivate the utilities to

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[7] §399.16(d)(3) codifies provisions of SB 1036, but similar restrictions on spending money on renewable energy after exhaustion of above market funds existed in previous versions of §399.16.

[8] TURN strongly supports measures to meet the 20% target. We note, however, that the renewable industry has long promised *decreasing* prices due to increased renewable generation. The recent evidence of increasing prices (especially for wind) may warrant the use of safety valves to limit ratepayer costs.

pay outrageous prices for RECs (as well as short term bundled contracts). This appears to be the scenario posited by SCE.

However, the Commission need not and should not allow the utilities to pay outrageous prices for RECs that do nothing to support additional renewable energy but simply provide an additional profit stream to "existing facilities." The combined effect of Sections 399.15(d)(3) and 399.16(a)(8) is to excuse additional purchases of either bundled power or RECs if an IOU has already exhausted its allocation of above-market costs.

PG&E provides a different analysis of the potential cost trajectory of unbundled RECs. PG&E argues that there is little substantive difference between tradable RECs and a bundled power contract, and that the price of each will simply depend on the Commission's willingness to approve contracts that include "a price premium for renewable power."[9] PG&E asserts that in order to meet its RPS obligation the utility will purchase either RECs or bundled power (using least cost and best fit principles), and that these two options "will likely become very close, although not perfect, substitutes, which will ensure that the implicit price paid for a REC in a bundled transaction will not deviate much from the price that an unbundled REC commands." PG&E thus concludes that an IOU "will purchase RECs so long as the price is at or below any Commission-approved price, regardless of the $50/MWh penalty, provided such a purchase meets the last cost-best fit criteria."

TURN suggests that PG&E's conclusion that unbundled and tradable REC prices will converge with the "implicit" REC price included as the renewable power cost

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[9] PG&E Post-Workshop Comments, p. 11.

premium fails to fully consider the legal and factual differences between bundled power contracting and potential tradable REC market transactions through WREGIS, and that in reality TREC prices could spike much higher than bundled power costs.

While there is a safety valve on REC costs *after* above-market funds have been expended, there appears to be no statutory safety valve preventing the utilities from spending any price for RECs if they have not exhausted above-market funds. This is a serious concern for ratepayers. The existing statutory cost control measures and the authorization of flexible compliance after 2010 in SB 107 provide direction to the Commission to ensure that it does not allow developers to fleece ratepayers by allowing TREC purchasing at all costs. But it will be up to the Commission to actively reject high-priced TREC contracts, since the utilities are likely to sign such contracts (assuming any short term TRECs are available) rather than attempt to justify lack of compliance.

The amount of money a utility might pay for a TREC to meet its compliance target is thus difficult to ascertain at this time. Whether a utility will pay more than the noncompliance penalty will depend in large part on its willingness to test existing rules governing penalty payments, on the details of the flexible compliance rules for 2010 and beyond that remain to be decided, and on the willingness of the Commission to protect ratepayers by rejecting unreasonably priced contracts.

Several parties dispute the validity of Dr. Weiss' "boom/bust" analysis by claiming that flexible compliance rules will reduce seller market power, essentially by changing the vertical demand curve. TURN suggests that there is lack of factual clarity concerning the impact of flexible compliance rules on supply and demand, especially given that compliance rules for 2010 and after have not been finalized.

The RPS statute, even as modified by SB 107 and SB 1036, was designed to promote procurement of renewable power but without handing a blank check to any developer or to existing renewable power producers. The Commission should ensure that its policies concerning TRECs do not result in wasteful spending for existing renewable resources. The easiest way to ensure that TRECs do not undermine the development of new resources or harm ratepayers is simply to prohibit the use of TRECs for compliance. The arguments in support of TRECs have not enunciated sufficient benefits that warrant the authorization of TREC trading. The Commission should first adopt flexible compliance rules as promised in D.06-10-059 before embarking with TREC trading.

While a couple of parties asserted that TRECs would result in new resources, the only specific comments made clear that TRECs would simply provide an additional value stream for existing resources, such as rooftop solar installed through the California Solar Initiative or wind projects constructed in the Northwest. Those projects would generate energy in any case, and TREC purchasing would simply result in contract shuffling to provide California ESPs with paper RECs. TURN suggests that providing surplus profits to existing renewable producers was not the intent of the RPS legislation.

TURN notes that the Union of Concerned likewise posits that "in the long run, assuming a well-designed and properly functioning RPS market," REC prices should represent the premium for renewable energy over brown power. However, UCS also notes that the experience in other RPS compliance markets is that "long-term bundled contracts are priced independently of the short-term supply and demand fluctuations that tend to determine price effects in short-term REC markets."

UCS also notes that while "RECs may help stimulate development of new renewable generation" by merchant developers who are willing to take the risk of developing projects without long-term contracts for the power, this potential may be highly limited in California and should be weighed against the "adverse consequences that a substantial shift from long-term contracts for renewables to shorter-term procurement models would have on cost, rate stability, and the development of new renewable resources."[10]

For this reason, UCS recommends that instead of a price cap on TRECs, the Commission adopt a stricter condition on the purchase of long-term bundled power before an LSE could use TRECs for compliance. Whereas current rules allow LSEs to use short term bundled contracts to comply with the RPS as long as the LSE signs up at least 0.25% of its IPT with long term contracts, UCS proposes an additional condition requiring a greater percentage of long-term bundled contracting (or contracts with new facilities) prior to allowing the use of TRECs for compliance.

If the CPUC approves the use of TRECs then TURN strongly supports adoption of the additional condition recommended by UCS. TURN identified the potential negative impact on long-term contracting from reliance on TRECs as one of the main drawbacks of authorizing TREC contracting. Adopting a stricter 0.75% limit is a very simple and easy to implement condition that would substantially mitigate this concern. It can easily be incorporate in existing reporting and compliance requirements. While TURN earlier supported the proposed price cap of $35/MWH, in light of the utility comments concerning their willingness to pay prices above the price cap, TURN agrees

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[10] UCS Post-Workshop Comments, p. 8.

that an 0.75% precondition on long-term contracting together with reasonableness review of TREC prices in comparison to bundled renewable power is a better mechanism for ensuring the benefits of RPS accrue to California ratepayers.

II. Reply concerning the impact of TRECs on new renewable project development

The post-workshop comments of Evolution Markets represent one example of the perspective of parties who completely support the use of TRECs for RPS compliance. These comments contain several errors.

First, Evolution Markets argues that TRECs will alleviate transmission constraints and provides an example of how SDG&E could purchase RECs from Northern California. Even SDG&E correctly points out that under current flexible delivery requirements, TRECs do not avoid the need for generation to access new renewable projects but merely avoid the need to use power swaps or book outs as a means of achieving accessing existing renewable power.

More importantly, Evolution Markets postulates that *after* selling its REC a renewable resource could be developed by selling *the underlying null power* would with a "fixed price" long term contract. Thus, Evolution Markets concludes that "debt investors routinely lend to renewable developers based on the sale of a long term strip of unbundled RECs as well as a long term PPA contract for the underlying null power."[11]

Perhaps Evolution Markets knows of some examples of such "dual sales" of both a long-term REC and long-term null power, **but no California LSE – whether IOU or**

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[11] Evolution Markets Post-Workshop Comments, p. 3.

ESP – is signing long term fixed price contracts for null (brown) power![12] This is precisely the reason why RECs would not stimulate new renewable power, since it is extremely unlikely that any renewable projects would get developed if the developer had to take on the price risk of the power output (i.e. hoped to make a profit by selling at competitive spot market prices). Evolution Markets' conclusions about TRECs increasing the number of renewable projects and thus exerting downward pressure on bundled renewable energy prices all flow from this false assumption.

Evolution Markets opines that TREC prices will "follow" long term bundled energy pricing, and notes that an LSE would never buy TRECs if bundled energy was less expensive. As UCS noted, this is not at all the case with short term TREC contracts in other compliance markets. And as explained above, there is a statutory loophole that would motivate IOUs to sign high-priced REC contracts to meet 2010 compliance if not all above-market funds have been expanded and no short term bundled power was available.

Evolution Markets also notes that "almost all REC markets" have lower renewable pricing[13] and claims that there is a causal relationship. This conclusion is not supported by the presentation made by Mr. Ben Rees of Evolution Markets, which concretely described how REC prices correlate with geographic and eligibility limits on qualifying renewable energy. Indeed, the REC market and Alternative Compliance Payment mechanism in Massachusetts have failed to spur much renewable generation, so

[12] California IOUs can sign long-term PPAs. However, these are all essentially indexed or tolling contracts.
[13] Evolution Markets Post-Workshop Comments, p. 8.

that Massachusetts is currently considering imposing a long-term contracting requirement.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Larry Wong, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On December 5, 2007 I served the attached:

TURN'S POST-WORKSHOP REPLY COMMENTS ON

TRADABLE RENEWABLE ENERGY CREDITS (TRECS)

on all eligible parties on the attached lists to **R.06-02-012, R.06-05-027, R.06-03-004 and R.06-04-009**, by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this December 5, 2007, at San Francisco, California.

_____/S/__________

Larry Wong

Service List for R.06-02-012, R.06-05-027, R.06-03-004 and R.06-04-009

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