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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA AND THE CALIFORNIA ENERGY COMMISSION**

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| 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<br>(Filed April 13, 2006)<br><br>Energy Commission Docket 07-OIIP-01 |

# REPLY COMMENTS OF PACIFICORP (U 901 E) ON EMISSION REDUCTION MEASURES AND MODELING-RELATED ISSUES

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Date: January 18, 2008

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# REPLY COMMENTS OF PACIFICORP (U 901 E) ON EMISSION REDUCTION MEASURES AND MODELING-RELATED ISSUES

Pursuant to the *Administrative Law Judges' Ruling Requesting Comments on Modeling Related Issues* dated November 9, 2007 (the "Ruling"), and the *Administrative Law Judges' Ruling Extending Comment Deadlines and Addressing Procedural Matters* dated November 30, 2007, PacifiCorp respectfully submits these reply comments on the Energy and Environmental Economics, Inc. ("E3") modeling methodology, a California Public Utilities Commission ("Commission") Staff workpaper on available emission reduction measures, and E3's model. PacifiCorp appreciates the opportunity to provide reply comments on these important issues.

## I. INTRODUCTION

PacifiCorp is one of the West's leading utilities, serving more than 1.6 million customers in six western states (California, Idaho, Oregon, Utah, Washington, and Wyoming). In California, PacifiCorp serves approximately 46,500 customers in Del Norte, Modoc, Shasta and Siskiyou counties. PacifiCorp has more than 10,400 megawatts of generation capacity on a system-wide basis from coal, hydro, wind power, natural gas-fired combustion turbines, solar

and geothermal. PacifiCorp also has ownership interests in thermal generation units located in three additional western states (Arizona, Colorado, and Montana).

Importantly, PacifiCorp respectfully requests that the Commission not perceive the absence of comments by PacifiCorp on any specific issue or other matter as a conclusive indication of PacifiCorp's lack of interest with respect thereto. PacifiCorp acknowledges the ongoing nature of this proceeding and reserves the right to present additional comments at a future time, as necessary.

## II. DISCUSSION

### A. Questions Related to Attachment A, Public Utilities Commission Staff workpaper entitled "Greenhouse Gas Emissions Reduction Measures for the Electricity and Natural Gas Sectors Under Consideration as Part of R.06-04-009"

PacifiCorp provides reply comments to the relevant questions below.

**Question No. 1.** **Does Attachment A cover all of the viable emissions reduction measures available in the electricity and natural gas sectors? If not, what other measures should be considered for the purposes of forecasting emissions reduction potential within these sectors? Please include suggested data sources and references for information regarding any additional measure you purpose.**

PacifiCorp concurs with Southern California Edison's ("SCE") opening remarks citing "grid applications" as additional viable emissions reduction measures that should be considered by the Commission and the California Energy Commission ("CEC"). More specifically, SCE observed:

> "Grid applications are projects that lower electrical losses or reduce greenhouse ("GHG") emissions through infrastructure changes to the electrical grid (e.g., wires, substation). One example of a grid application is the replacement of existing distribution get-a-ways having aluminum cable with copper cable. Such change may significantly reduce electrical losses and thereby reduce GHG emissions at a cost that is competitive when compared to the cost of alternatives. Another example of an overlooked, yet potentially competitive, grid application is the replacement of existing lower-voltage facilities, such as transmission lines, with higher operating voltage facilities. A project that increases transmission line voltages from 500 kV to 765 kV could aid the State's GHG reduction

efforts by reducing electrical losses." SCE Opening Comments at 2-3.

PacifiCorp also concurs with the Natural Resources Defense Council ("NRDC") and the Union of Concerned Scientists ("UCS") observation that repowering and retirement of high greenhouse gas GHG-emitting fossil-fueled plants should also be considered viable emission reduction measures and that the Staff workpaper should acknowledge that carbon capture and sequestration technology can indeed make important potential contributions during the 2020 timeframe, provided that legal and regulatory barriers are addressed. Joint Comments of NRDC and UCS at 3-5.

Finally, PacifiCorp agrees with Pacific Gas and Electric's ("PG&E") observation that oxyfuel combustion should also be considered a viable emission reduction measure. PacifiCorp's omission of oxyfuel combustion within its opening remarks was an oversight, since PacifiCorp is partnering with other utilities in a demonstration project facilitated by the Electric Power Research Institute ("EPRI").[1]

The Staff workpaper would be much improved if it included a more robust discussion on new viable emission reduction measures or enabling technologies, such as those that focus on reductions in transmission line losses or avoiding fugitive GHG emissions; the repowering and retirement of high GHG-emitting fossil-fueled plants; or successfully demonstrating and commercializing post-combustion carbon dioxide ("$CO_2$") capture technology, such as oxyfuel combustion systems.

**Question No. 3. What means beyond policies currently adopted by the two Commissions hold potential for the delivery of additional energy efficiency?**

As a follow-up to PacifiCorp's opening comments advocating "smart grid" as a

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[1] PacifiCorp recommends an EPRI article titled, "The Challenge of Carbon Capture"; Electric Power Research Institute (Spring 2007). See, http://mydocs.epri.com/docs/CorporateDocuments/EPRI_Journal/2007-Spring/1014795_CarbonCapture.pdf.

key enabling technology, PacifiCorp refers Commission staff to two recently released studies[2] authored by the Pacific Northwest National Laboratory ("PNNL"). The PNNL teamed up with regional utilities, including PacifiCorp, and industry partners in a year-long Pacific Northwest GridWise™ Demonstration Project to test the notion that smart grid technologies and consumers can play an active role in managing the grid. The two separate studies tested demand-response concepts and technologies.

The Olympic Peninsula Project concluded that homeowners are willing to adjust their individual energy use based on price signals -- provided via information technology tools. The Grid Friendly™ Appliance Project demonstrated that everyday household appliances can automatically reduce energy consumption at critical moments when they are fitted with controllers that sense stress on the grid. Both studies helped reduce pressure on the grid during times of peak demand.

**Question No. 4. What means beyond policies currently adopted by the two Commissions hold potential for the integration of additional renewable resources into the grid?**

In addition to the energy efficiency benefits identified within the two recent PNNL "smart grid" studies,[3] the technologies utilized within the studies can also adjust demand to respond to fluctuations in production from renewable resources such as solar and wind. This is an alternative to back-up power plants now used to balance wind farms. These technologies can help accommodate the intermittent nature of renewable resources like wind power, making it possible to effectively manage their integration into the power grid.

PacifiCorp agrees with opening comments made by the Western Power Trading Forum ("WPTF") and SCE which observe that the implementation of a tradable Renewable Energy Credits ("REC") system would increase integration of renewable resources into the grid by helping to overcome transmission barriers, and that the integration of a REC trading system

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[2] See Pacific Northwest National Laboratory press release dated January 9, 2008. See, http://www.pnl.gov/topstory.asp?id=285.

[3] *Ibid.*

and a GHG cap-and-trade system should be fully considered and modeled.

PacifiCorp also agrees with an observation made by PG&E that:

> "While over-generation was not mentioned in the Staff Workpaper or the E3 model, resolving the potential problems associated with over-generation could add substantial costs to procuring renewables. Over-generation occurs when significant amounts of uncontrolled generation exceed minimum loads. This usually occurs at night, during periods of high "as available" generation and low loads." PG&E Opening Comments at 20-21.

PacifiCorp concurs that over-generation is a potential economic barrier to adding greater amounts of renewable resources to the grid. The risk of over-generation further bolsters PacifiCorp's opening comments which encourage the Commission and CEC to examine new policies that would provide incentives to develop and commercialize enabling technologies meant to address intermittent power concerns created by certain renewable resource technologies (i.e., wind, solar, ocean).

## B. QUESTIONS RELATED TO ATTACHMENT B, E3'S MODELING DOCUMENTATION

PacifiCorp provides reply comments to the relevant questions below.

**Question No. 6. Does E3's modeling documentation adequately document the methodology, inputs, and other assumptions underlying its model? If not, what additional documentation should be added?**

Within its opening comments, PacifiCorp provided information on its ownership interests in out-of-state coal and natural gas power plants. PacifiCorp has not provided similar information for its non-fossil-fueled generating units. For 2006, PacifiCorp's owned the following non-fossil-fueled system resources as follows:

**Table One - PacifiCorp's Hydro Owned and Operated Generation**

| Unit | Location | Year Originally Constructed - Year Last Unit Installed | Nameplate Capacity |
|---|---|---|---|
| AMERICAN FORK | UT | 1907 | 0.95 |
| ASHTON | ID | 1917 | 6.85 |
| BEND | OR | 1913 | 1.11 |
| BIG FORK (MT) | MT | 1910 | 4.15 |
| CLEARWATER NO. 1 | OR | 1953 | 15 |
| CLEARWATER NO. 2 | OR | 1953 | 26 |
| CLINE FALLS | OR | 1943 | 1 |
| CONDIT | WA | 1913 | 9.6 |
| COPCO NO. 1 | CA | 1918-1922 | 20 |
| COPCO NO. 2 | CA | 1925 | 27 |
| COVE | ID | 1917 | 7.5 |
| CUTLER | UT | 1927 | 30 |
| EAGLE POINT | OR | 1957 | 2.81 |
| EASTSIDE | OR | 1924 | 3.2 |
| FALL CREEK | CA | 1903 | 2.2 |
| FISH CREEK | OR | 1952 | 11 |
| FOUNTAIN GREEN | UT | 1922 | 0.16 |
| GRACE | ID | 1908-1923 | 33 |
| GRANITE | UT | 1896 | 2 |
| GUNLOCK | UT | 1917 | 0.75 |
| IRON GATE | CA | 1962 | 18 |
| J. C. BOYLE | OR | 1958 | 90.35 |
| LAST CHANCE | ID | 1983 | 1.73 |
| LEMOLO NO. 1 | OR | 1955 | 31.99 |
| LEMOLO NO. 2 | OR | 1956 | 33 |
| LIFTON | ID | 1917 | pumping plant |
| MERWIN | WA | 1931-1958 | 136 |
| OLMSTED | UT | 1904-1922 | 10.3 |
| ONEIDA | ID | 1915-1920 | 30 |
| PARIS | ID | 1910 | 0.72 |
| PIONEER | UT | 1897 | 5 |
| POWERDALE | OR | 1923 | 6 |
| PROSPECT NO. 1 | OR | 1912 | 3.76 |
| PROSPECT NO. 2 | OR | 1928 | 32 |
| PROSPECT NO. 3 | OR | 1932 | 7.2 |
| PROSPECT NO. 4 | OR | 1944 | 1 |
| SAND COVE | UT | 1926 | 0.8 |
| SLIDE CREEK | OR | 1951 | 18 |
| SNAKE CREEK | UT | 1910 | 1.18 |

| | | | |
|---|---|---|---|
| SODA | ID | 1924 | 14 |
| SODA SPRINGS | OR | 1952 | 11 |
| ST. ANTHONY | ID | 1915 | 0.5 |
| STAIRS | UT | 1895 | 1 |
| SWIFT NO. 1 | WA | 1958 | 240 |
| TOKETEE | OR | 1949-1950 | 42.5 |
| UPPER BEAVER | UT | 1907 | 2.52 |
| VEYO | UT | 1920 | 0.5 |
| VIVA NAUGHTON (WY) | WY | 1986 | 0.74 |
| WALLOWA FALLS | OR | 1921 | 1.1 |
| WEBER | UT | 1911 | 3.85 |
| WEST SIDE | OR | 1908 | 0.6 |
| YALE | WA | 1953 | 134 |

**Table Two - PacifiCorp's Wind or Geothermal-Owned and Operated Generation**

| Unit | Location | Year Placed in Service | Type of Generation | Nameplate Capacity |
|---|---|---|---|---|
| Blundell | Milford, Utah | 1984 | Geothermal | 26.1 |
| Foote Creek Rim 1 | Foote Creek Rim, Wyoming | 1998 | Wind | 32.3 |
| Leaning Juniper 1 | Arlington, Oregon | 2006 | Wind | 100.5 |
| Marengo | Dayton, Washington | 2007 | Wind | 140.4 |

PacifiCorp also agrees with an observation made by San Diego Gas and Electric ("SDG&E") within its opening remarks:

> "As far as supply side resources are concerned, SDG&E would note that the model is missing some resources. SDG&E is not able to determine at this time if the absence of these resources is having any meaningful impact on the analysis. SDG&E would note that the resources that are missing tend to be qualifying facilities ("QFs") and smaller resources; however, many of these smaller resources are renewable resources. The omission of these smaller resources likely occurs because they are connected at lower voltages thus not included in the transmission data base that was used." SDG&E Opening Comments at page 8.

PacifiCorp likewise has not attempted to identify its assignable contracts for purchased power from within E3's "Generator Data and Generator Ownership/Contract Assignments to LSEs" Excel spreadsheet. It is unclear whether doing so would have any meaningful impact on the E3 analysis. PacifiCorp also agrees with Southern California Public

Power Authority ("SCPPA") opening comments which state:

> "It would be helpful for E3 to provide further information about energy efficiency supply curves that are described in the E3 Documentation (at E49 – E51). E3's GHG calculator shows that energy efficiency offers the greatest opportunity to reduce GHG emissions at a low cost. Thus, it is especially important that the assumptions and data that underlie the energy efficiency supply curves be readily apparent to stakeholders." SCPPA Opening Comments at page 8.

The E3 Calculator makes key assumptions about costs and effectiveness of energy efficiency measures. Given that the model results are highly dependent on inputs, particularly energy efficiency, all of these key assumptions have the potential to mischaracterize costs and impacts of various carbon reduction strategies for the electricity sector. Without further information about the studies that led to the assumptions that produced the energy efficiency supply curves, it is difficult to conclusively state whether or not the assumptions are appropriate.

**Question No. 12. What specific flexible GHG emission reduction mechanisms to mitigate the economic impacts of achieving the desired GHG emission reductions should be modeled in Stage 2?**

PacifiCorp agrees with the general comment made by stakeholders that it is not clear that the E3 Calculator is helpful in its current configuration in assessing impacts of carbon trading, allowance allocation or other flexible mechanisms (such as banking and borrowing) without additional extrapolation. In addition to modeling different levels of carbon offsets, we concur with the joint comments of NRDC and UCS that called for flexible compliance mechanism modeling of 1) trading of allowances between parties; 2) multi-year compliance periods (e.g., 3 years); and 3) banking of allowances from one compliance period to the next, as part of Stage 2 of E3's modeling efforts. NRDC and UC Joint Opening Comments at page 18.

## III. CONCLUSION

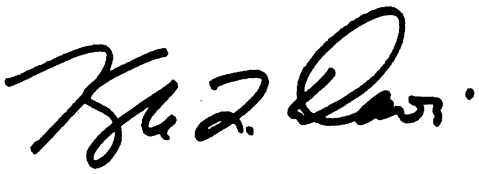
PacifiCorp appreciates the opportunity to provide reply comments on the Commission Staff workpaper on available emission reduction measures and the E3 modeling methodology. PacifiCorp respectfully requests that the Commission give careful consideration to

the suggested program improvements detailed herein. PacifiCorp looks forward to working with the Commission on these important issues.

Dated: January 18, 2008

Respectfully submitted,

By



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## CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of January, 2008, I caused to be served, a true and correct copy of the foregoing

**REPLY COMMENTS OF PACIFICORP (U 901 E) ON EMISSION REDUCTION MEASURES AND MODELING-RELATED ISSUES**

to be served on the parties on the attached service list via Electronic Mail or U.S. Mail and Overnight delivery to the parties below:

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Executed this 18th day of January, 2008

Ariel Son
Coordinator, Administrative Services

## Certificate of Service

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this 18th day of January, 2008 provided via electronic mail, a true and correct copy of REPLY COMMENTS OF PACIFICORP ON EMISSION REDUCTION MEASURES AND MODELING-RELATED ISSUES to the following parties:

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