FILED
02-28-08
04:59 PM

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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

BEFORE THE CALIFORNIA ENERGY COMMISSION

Order Instituting Informational Proceeding AB-32 Implementation: Greenhouse Gases	Docket 07-OIIP-01

COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON PROPOSED DECISION

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February 28, 2008

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

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I. INTRODUCTION AND BACKGROUND

Pursuant to Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission"), San Diego Gas & Electric ("SDG&E") and Southern California Gas Company ("SoCalGas") hereby submit these comments concerning the Phase 2 Proposed Decision of President Peevey (the "Proposed Decision" or "PD"), mailed on February 8, 2008.

The PD proposes nine recommendations to the Air Resources Board ("ARB") regarding the structure of a greenhouse gas ("GHG") emissions reductions regulatory framework for the electricity and natural gas sectors of the California economy. The PD is the product of an extensive effort by the Commission staff and parties to develop a framework for implementing AB 32 mandated GHG emissions reductions. The Commission is to be commended for taking the first steps in addressing the large number

of policy issues associated with implementing AB 32 to the benefit of Californians in supporting a cap-and-trade structure and defining the scope of the cap-and-trade framework.

SDG&E and SoCalGas fully support the PD's findings that adopt a deliverer approach and a cap-and-trade system, especially one that can be integrated with other states in the west, and be further integrated with a national system. This represents the best option for the state to pursue and show its leadership in this area. SDG&E and SoCalGas agree with the PD's assessment that a cap-and-trade system can produce benefits beyond mandatory programs and will provide the price signals needed to encourage investment and achieve the reduction at the lowest possible costs. SDG&E and SoCalGas are also in agreement that the natural gas sector as defined in the PD initially be addressed in a programmatic manner. SDG&E and SoCalGas look forward to working with the Commission, the Energy Commission, the ARB and others parties in the near future to define and clarify many of the details needed to implement the direction put forward by this decision.

As is explained in greater detail below, SDG&E and SoCalGas propose limited revisions to the PD in order to address factual and legal errors, in accordance with Rule 14.3. Specifically, SDG&E and SoCalGas propose that the PD be revised to better reflect the intent of the PD to rely on a cap-and-trade structure for GHG reductions in California. In addition, SDG&E and SoCalGas recommend that the PD be revised to clarify the allowance allocation/auction issue and clearly state that any revenues from the auction of allowances in the electric sector should go to the benefit of California electric consumers.

II.

THE PD SHOULD BE REVISED TO ELIMINATE REFERENCE TO AN EXPANDED RENEWABLES PORTFOLIO STANDARD

The Findings of Fact ("FOF") in the PD lay out strong reasons for supporting a cap-and-trade program including the following:

- Would lower costs relative to mandatory reductions (FOF 7)
- Provides flexibility in meeting targets (FOF 8)
- Provides strong incentives for investment in research and innovation in technologies (FOF 9)
- Allows market participants to manage risk (FOF 10)
- Efficiently distributes the cost of GHG reductions (FOF 11)
- Provides experience with trading programs (FOF 12)

While strongly supporting a cap-and-trade system, the PD overlays the cap-and-trade structure on top of an expanding set of direct regulations. There is a significant risk that increased statutory mandates on the mix of supply resources such as those contemplated in Interim Order 3 of the PD could constrain compliance options to such a degree as to render a cap-and-trade framework ineffective in enhancing cost effectiveness of GHG reduction.

In order for a cap-and-trade system to function effectively, a full range of choices need to be available to participants. Contrary to statements in the PD at page 33, "that the cap-and-trade system need only produce a relatively small portion of the overall emissions reductions in the short term", cap-and-trade markets should be as wide and deep as possible. GHG reductions associated with new mandatory measures should be focused on actions where there is a disconnect between prices and actions (e.g., building and appliance standards among small electric customers). The GHG reductions associated with mandatory measures cannot consist of the majority of the reductions to

meet the aggregate GHG cap where a cap-and-trade regime is to function and improve cost effectiveness.

While Commission policy on expanding energy efficiency and renewables would be a critical component of SDG&E GHG emissions reduction actions, statutory mandates limit flexibility and negate the benefits of a cap-and-trade system. FOF 7 as written is likely to create confusion:

> For the electricity sector, a cap-and-trade system, in conjunction with the continuation and strengthening of existing policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard as recommended in this decision, is likely to be a less expensive means of complying with AB 32 GHG emission reduction requirements than sole reliance on existing and increased mandatory programmatic requirements.

It states that a cap-and-trade system should be able to produce the GHG emissions reductions required by AB 32 at a lower cost than reliance on "increased mandatory programmatic requirements." SDG&E and SoCalGas cannot see how the latter part of FOF 7 is compatible with proposing additional statutorily mandated reductions in the first clauses of the statement. There is no distinction between "strengthening existing policies" and "reliance on existing and increased mandatory programmatic requirements." While the emissions price mechanism would provide incentive to regulated entities to select the most efficient options to reduce emissions, the in-place incremental command-and-control regulations on supply choices, such as an expanded renewables portfolio standard ("RPS"), would prevent such actions. While existing legislated mandates cannot be ignored, and the PD appropriately recommends equal treatment of all market participants with regard to existing mandates, new supply-side

mandates should not be simultaneously adopted with a cap-and-trade program.[1]

Further, adoption of additional statutorily mandated GHG reductions from an expanded RPS may seriously complicate GHG emissions trading since any action taken pursuant to a mandate may not be eligible to be traded under AB 32 or any Federal GHG market that might be developed in the future, creating an additional tracking burden and an unnecessary economic burden for our customers. For example, if a load serving entity ("LSE") must use the purchase of renewable power to meet a mandated RPS, under AB 32 as well as typical provisions of most environmental legislation, it cannot then trade the GHG reduction associated with such a purchase.[2] This would deprive California utilities of the ability to sell allowances to higher emitters when they are below an applicable cap, thereby imposing unnecessary costs on electricity consumers.

Therefore, FOF 7 and Interim Order 3 of the PD should be modified as shown in Appendix "A" to encourage LSEs to go beyond the 20 percent mandate where cost effective, but it should not recommend to ARB that it is necessary to adopt new state-mandated RPS levels.

III.

THE PD SHOULD BE REVISED TO INCORPORATE CLARIFICATIONS REGARDING ALLOWANCE ALLOCATION AND AUCTION

SDG&E and SoCalGas also recommend several revisions regarding the allowance allocation and auction portion of the PD to avoid any potential ambiguity on the range of options the Commission is still considering in this proceeding.

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[1] There should be a distinction between regulations on demand-side regulations for small electric customers such as are reflected in building and appliance standards and regulations on the supply-side such as an expanded RPS. Expanded direct regulations are part of the way to reduce the demand for energy that is beyond utility control. Supply-side regulations, on the other hand, affect LSE decision-making and limit cost effective choices.

[2] This statement assumes a bundled REC and GHG credit or that the RPS is implemented for GHG reductions.

First, the first half of Interim Order 8 should be modified to recognize that under the first deliverer approach, allowances can both be allocated and auctioned. As written, Interim Order 8 implies that allowances can either be auctioned or allocated and that these options are mutually exclusive. In its comments, SDG&E and SoCalGas supported an allocation of allowances to LSEs with a subsequent auction of those allowances to the points of regulation. This auction serves the purpose of ensuring that points of regulation with compliance responsibility have non-discriminatory access to allowances while also ensuring that the value associated with allowances is assigned to customers. The SDG&E/SoCalGas proposed method ensures that all revenues from the auction flow to the parties ultimately paying the allowance cost in the form of higher electricity prices.[3] This method also avoids the problems of double payment (paying for the allowances and having to pay the costs of implementing GHG reductions) since the flow of funds provides a revenue source for LSE GHG reducing activities. Interim Order 8 should be modified as suggested in Appendix A to clarify that the referenced choice between allocation and auction is a choice between auction and allocation to LSEs, with a subsequent non-discriminatory auction on behalf of LSE's of all allowances to first deliverers.

Second, the second half of Interim Order 8 should be modified to avoid committing legal error regarding the use of proceeds from fees. Currently, the PD reads, "We recommend that at least some portion of the GHG emission allowances available to the electricity sector be auctioned, with <u>at least some portion</u> of the proceeds from the

[3] It is true that a single auction of allowances to first deliverers with the proceeds going to LSEs can accomplish the same goal. However, it is more assured that LSE will have the necessary funds to undertake GHG reductions if there is a two step process – allocation first with a subsequent non-discriminatory auction.

auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California." [Emphasis added] It should be modified as shown in Appendix A to state that "with all of the proceeds from the auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California."

Any auction revenues are legally a fee and thus must meet the legal standard established by the Sinclair Paint court decision.[4] A "Sinclair Test" requirement means that the fee must be reasonable and there must be a nexus between the purpose of the fee and the use of its revenues. The fee is intended to further the goals of AB 32 by reducing GHG emissions in California, so the revenues from the auction must be directed to GHG emission reduction activities on behalf of California's electric consumers. This proposed change in the language in Interim Order 8 would also be consistent with FOF 27 that states "As part of this approach, all proceeds from the auctioning of allowances for the electric sector would be used in ways that benefit electric consumers in California." [Emphasis added].

IV.
THE PD SHOULD BE REVISED TO INCORPORATE LIMITED ADDITIONAL CLARIFICATIONS

In addition to the modification described above, SDG&E and SoCalGas recommend several other limited revisions to the PD. First, the first clause of the statement on page 13 is factually incorrect and should be modified or eliminated. It reads, "No concerns related to 1990 emissions in the electricity and natural gas sectors have been identified to warrant development of recommendations by the two

[4] Taken from Economic and Technology Advancement and Advisory Committee (ETAAC) discussion of this issue; *see* ETAAC Final Report, pp. 9-4.

Commissions to ARB,…" In fact, the GHG emissions inventory was litigated exclusively in the ARB proceeding and was not an issue upon which comment was solicited in this proceeding. SDG&E and SoCalGas, through their parent Sempra Energy, have identified and raised concerns regarding the inconsistent methods used by ARB to calculate GHG emissions in the electric sector in the ARB GHG reporting requirements and the ARB GHG inventory, but this issue was raised only in the ARB proceeding.[5]

Second, Conclusions of Law ("COL") 2 should be modified to eliminate reference to Publicly Owned Utilities ("POUs") since the statements regarding POUs in COL 2 and COL 3 are contradictory and cannot both be factually correct.

Third, the following statement on page 98 regarding CHP should be clarified, "For gas-fired CHP plants that utilize electricity and thermal heat on site, the portion of the natural gas used in these processes should be considered part of the natural gas sector." If large enough, the CHP unit should be directly regulated by ARB as a point source. Further, if the CHP unit is large enough to be directly regulated in the electric sector, it would provide more uniform incentives for the whole facility to be part of the cap-and-trade structure so that it is not regulated twice, once under the cap-and-trade and once under direct programmatic regulations.[6] Alternatively, the statement could be modified to state the natural gas used in the CHP process should be considered part of the natural gas sector only if the annual emissions associated with the non-electric portion of natural gas use are below the ARB thresholds for being a large point source. The PD should affirm that entities are only covered once by AB 32 regulations.

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[5] *See* Sempra Energy comments filed with the ARB on November 19, 2007.

[6] While the emissions can be split, it should be recognized that CHP is often a single piece of equipment.

V.
CONCLUSION

The Commission is to be commended for taking the first major policy steps in implementing AB 32. Firmly making the significant policy choice in this PD to support a multi-sector cap-and-trade framework and providing definition of the scope of the cap-and-trade structure is a major and positive step forward. SDG&E and SoCalGas believe it is critical that the Commission now move forward expeditiously to address the remaining policy issues associated with the cap-and-trade framework necessary to support ARB in meeting its AB 32 imposed deadlines. We note that the ARB is scheduled to publish its full draft Scoping Plan in June, 2008. Therefore, the Commission should adopt the PD and move forward quickly on the policy issues that remain. SDG&E and SoCalGas look forward to continuing to work with the Commission to resolve the remaining policy issues in a manner that will create a viable, cost-effective, and equitable cap-and-trade structure.

For the reasons set forth herein, the PD should be revised to incorporate the modifications detailed above and set forth in Appendix "A" hereto.

Respectfully submitted this 28th day of February, 2008,

By: _____/s/ Kim Hassan _____
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APPENDIX A

Proposed Findings of Fact

1. The state Energy Action Plan lays out a "loading order" for investment in electricity resources in California that puts energy efficiency as the top priority, with renewable resources second, and clean fossil-fired generation to the extent other options are not available.
2. Energy efficiency building codes and appliance efficiency standards promulgated by the Energy Commission provide a base for energy and GHG emissions reductions.
3. Consistent with AB 2021, the Energy Commission has set statewide energy efficiency goals at the level of cost-effective investment in energy efficiency.
4. The Public Utilities Commission sets requirements and energy savings goals for energy efficiency programs for the IOUs, and has set up a risk/reward mechanism for the IOUs that allows them to earn financial incentives if they exceed the adopted energy savings goals and assesses penalties if they fail to meet the goals.
5. It is reasonable for the State of California to apply the same minimum requirements in the areas of energy efficiency and renewables to all retail providers of electricity.
6. It is reasonable that existing California policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard be maintained and strengthened as recommended in this decision.
7. For the electricity sector, a cap-and-trade system, in conjunction with the continuation ~~and strengthening~~ of existing policies regarding energy efficiency building codes and appliance efficiency standards, retail provider energy efficiency programs, the renewables portfolio standard program, and the emissions performance standard as recommended in this decision, is likely to be a less expensive means of complying with AB 32 GHG emission reduction requirements than sole reliance on existing and increased mandatory programmatic requirements.
8. For the electricity sector, GHG emissions trading would maximize flexibility in achieving emissions targets by allowing obligated entities to rely on least-cost options across the entire economy.

9. For the electricity sector, a GHG emissions cap-and-trade program would encourage investment in research and innovation in technologies that lower GHG emissions.
10. For the electricity sector, a GHG emissions cap-and-trade program would allow market participants to manage risk associated with compliance obligations.
11. For the electricity sector, a GHG emissions cap-and-trade program would distribute the cost of GHG reductions most efficiently across all capped entities.
12. Implementing a GHG emissions cap-and-trade system in 2012 for the electricity sector would allow entities to gain experience with finding real leastcost GHG emission reduction opportunities.
13. It is reasonable for ARB to proceed to design a multi-sector GHG emissions cap-and-trade system for California that includes the electricity sector, for implementation in 2012, as described in this decision.
14. For the electricity sector, placing the compliance obligation in a GHG emissions cap-and-trade system on the entities that deliver power to the electricity grid in California, which we call "deliverers," is reasonable because this point of regulation best meets, on balance, the most important criteria, as described in this decision.
15. By choosing a deliverer *point of regulation* we are simply choosing a trigger that determines which entities have to comply, but what is being regulated is the amount of GHGs being produced in California or to supply electricity to customers located in California.
16. The deliverer point of regulation does not single out wholesale sales of electricity, but rather applies uniformly to electricity consumed in California and electricity generated in California.
17. An entity with compliance obligations under a deliverer form of regulation, if it does not already possess enough allowances, would have an opportunity after delivery of the energy to acquire allowances on the market or to show compliance using offsets or other flexible compliance mechanisms.
18. The GHG regulatory program we are proposing would not prevent even high-GHG sources from providing reliability services when needed.
19. A deliverer point of regulation would treat all electricity delivered to the California grid the same, whether that electricity is generated in California or elsewhere. In either

case, the deliverer would later have to surrender GHG allowances (or secure adequate offsets) based on the amount of GHG emissions associated with that electricity.

20. "Global warming poses a serious threat to the economic well-being, public health, natural resources, and the environment of California. The potential adverse impacts of global warming include the exacerbation of air quality problems, a reduction in the quality and supply of water to the state from the Sierra snowpack, a rise in sea levels resulting in the displacement of thousands of coastal businesses and residences, damage to marine ecosystems and the natural environment, and an increase in the incidences of infectious diseases, asthma, and other human health-related problems." (Health & Safety Code § 38501(a).)

21. "Global warming will have detrimental effects on some of California's largest industries, including agriculture, wine, tourism, skiing, recreational and commercial fishing, and forestry. It will also increase the strain on electricity supplies necessary to meet the demand for summer air-conditioning in the hottest parts of the state." (Health & Safety Code § 38501(b).)

22. The local benefits to California of reducing GHG emissions are further elaborated in the Final Climate Action Team Report to the Governor and the Legislature (presented to the Legislature in March 2006) and other sources.

23. Any burdens on interstate commerce that may result from the implementation of AB 32 under the regulations that we recommend to ARB (including a deliverer point of regulation) would be purely incidental, while the local benefits to California of reducing GHG emissions, and therefore the impact of global warming, would be most significant.

24. The proposed GHG regulations are intended to change the way that electricity is generated and consumed and are expected to increase the use of (i) renewable resources to generate electricity, (ii) low-emitting sources of generation, and (iii) more efficient methods of using electricity. To the extent such actions are unable to sufficiently reduce GHG emissions associated with the use of electricity, these regulations are expected to result in investments outside of the electricity sector that will cost-effectively reduce GHG emissions from other activities.

25. It is reasonable to regulate the GHG emissions associated with the multi-jurisdictional utilities' deliveries of electricity to the California grid on a retail provider basis, with

GHG emissions attributed based on a proportional share of their electricity sales in California.

26. The auctioning of at least some portion of the emission allowances available to the electricity sector would promote liquidity in the emission allowance market, improve the accuracy of emission allowance prices as a reflection of marginal emission reduction costs, and allow new market entrants access to allowances on an equal basis with other parties.

27. It is reasonable to require that at least some portion of the GHG emissions allowances for the electricity sector be auctioned in a GHG emissions cap-and-trade system in which deliverers are the point of regulation for the electricity sector. As part of this approach, all proceeds from the auctioning of allowances for the electricity sector would be used in ways that benefit electricity consumers in California.

28. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable mixture of auctioning and the administrative allocation of GHG emissions allowances for the electricity sector.

29. The record in R.06-04-009 is not sufficient, at this time, to determine a reasonable approach for the administrative allocations of GHG emissions allowances, if such free distributions are undertaken.

30. It is reasonable for the State of California to apply the same minimum requirements in the areas of energy efficiency and energy conservation to all entities that provide retail sales, transportation, and/or distribution of natural gas to end-users in California.

31. Key differences between the electricity and natural gas sectors make it reasonable to recommend that ARB to proceed to design a multi-sector GHG emissions cap-and-trade system for California but to not include the natural gas sector at this time.

32. Entities in the natural gas sector have fewer options to reduce GHG emissions than entities in the electricity sector.

33. There are limited commercially available lower carbon alternative sources of natural gas.

34. The only reliable near-term options for reducing GHG emissions in the natural gas sector are energy efficiency programs.

35. The incremental benefits from including the natural gas sector in a multi-sector GHG emissions cap-and-trade system are likely to be less than those from including the electricity sector.
36. Reporting protocols for GHG emission arising from the storage, transportation and distribution of natural gas to end-users are under development and do not yet include provisions for reporting end-user combustion related GHG emissions.
37. Implementing a multi-sector GHG emissions cap-and-trade system that includes small end-users of natural gas now may expose those customers to greater price risk than small end-users in the electricity sector.
38. Including all fuels in a multi-sector cap-and-trade system could maximize the benefits of a market-based system.
39. Taking a programmatic approach to the natural gas sector now does not preclude future inclusion in a multi-sector GHG emissions cap-and-trade system.
40. It is reasonable for ARB to not include the natural gas sector when designing a multi-sector GHG emissions cap-and-trade system for California, for implementation in 2012, as described in this decision.

Proposed Conclusions of Law

1. AB 2021 requires the Energy Commission, in consultation with POUs and the Public Utilities Commission, to set statewide energy efficiency goals.
However, the statute does not require that POUs comply with the energy efficiency goals set by the Energy Commission.
2. SB 1068 as amended by SB 107 requires that IOUs, CCAs, and ESPs~~, and POUs~~ obtain at least 20% of delivered electricity from renewable sources by 2010.
3. SB 107 requires POUs to set RPS targets, but does not specify minimum delivery requirements or the types of renewables that should qualify.
4. The FPA does not address GHG emissions, nor is there any suggestion in the FPA or in its administration that Congress intended to forbid states from enacting GHG regulations on their own.
5. 16 U.S.C. § 824(a) states: "Federal regulation . . . [under the FPA extends] only to those matters which are not subject to regulation by the States." This broad savings clause supports the conclusion that because air pollution is subject to regulation by the

States, and not by the FPA or the FERC, state regulation of GHG emissions caused by the generation and consumption of electricity is not preempted by the FPA, but may be regulated by the States.

6. Because the FPA expressly leaves room for state regulations dealing with electricity and because there is nothing in the FPA that deals with the regulation of emissions (either generally, or GHG emissions specifically) the deliverer approach is not preempted by the FPA.

7. A GHG regulation that incorporates a deliverer point of regulation is an environmental regulation whose purpose is to decrease the impact of global warming on California insofar as that impact is caused by electricity used or generated in California. Such a GHG regulation is not a regulation of wholesale rates or other terms and conditions of wholesale power sales or electric transmission that the FPA and FERC exclusively regulate.

8. There is no field preemption here because, in enacting the FPA, Congress did not intend, either explicitly or implicitly, to occupy the field of environmental regulation of the power sector.

9. There is no FPA field preemption here because, under AB 32, California will not be regulating the same subject matter as the FPA, nor will its regulations be for the same intended purpose. California will be regulating GHG emissions for the purpose of reducing them and lessening the impacts of global warming on California.

10. While GHG regulation may have some impact on the wholesale prices paid for electricity, such regulation is no more preempted by the FPA than state regulations limiting the amount of other pollutants that may be emitted by electric power plants -- that may affect the cost of generating electricity and therefore indirectly affect the price of wholesale electricity.

11. The inclusion, in FERC-jurisdictional rates, of any costs of compliance with California's GHG regulations would be subject to FERC review under § 205 of the FPA (16 U.S.C. § 824d). All wholesale sales subject to FERC jurisdiction would occur at the FERC-authorized rate.

12. The proposed structure for regulating GHG emissions would not prevent anyone from selling wholesale electricity into the California market, nor is a license required to do so.

13. The proposed deliverer point of regulation would not conflict with the FPA's electric reliability provisions.
14. A deliverer point of regulation is not preempted by the FPA.
15. The regulations we are proposing are facially neutral, as between interstate and intrastate commerce, and do not have a discriminatory purpose or effect.
16. Under *Pike v. Bruce Church, Inc.* (1970) 397 U.S. 137, 142, a state enactment "will be upheld unless the burden imposed on [interstate] commerce is clearly excessive in relation to the putative local benefits."
17. The use of a deliverer point of regulation would not violate the dormant Commerce Clause.
18. The deliverer point of regulation would only regulate electricity that is generated in, or delivered for consumption in, California. Thus, it would not regulate any commerce that occurs totally outside of California, and therefore would not regulate extraterritorially in violation of the Commerce Clause.
19. The fact that the Legislature required reporting by retail providers does not mean that retail providers must be the point of regulation for achieving the required reductions in GHG emissions.
20. Our recommended deliverer point of regulation would not cover power that is merely wheeled through California.

INTERIM ORDER

IT IS ORDERED that:

1. We recommend that the California Air Resources Board (ARB) adopt mandatory levels of energy efficiency savings for publicly owned utilities (POUs), the same as those required of investor owned utilities (IOUs) by the California Public Utilities Commission (Public Utilities Commission), and consistent with energy savings requirements as recommended by the California Energy Commission (Energy Commission).
2. We recommend that ARB require POUs to deliver at least 20 percent renewable electricity to their customers by a date certain, perhaps 2015 or 2017.
3. We recommend that ARB work with the Public Utilities Commission and the Energy Commission to encourage ~~set requirements that all~~ retail providers of electricity to ~~must~~

deliver more than 20 percent of their power from renewable sources in the future, when cost effective, ~~at levels and dates to be determined~~.

4. We recommend that, if ARB concludes that it does not have authority to adopt regulations consistent with Ordering Paragraphs 1 and 2, ARB seek such authority from the Legislature.

5. We recommend that ARB design a multi-sector cap-and-trade system for greenhouse gas (GHG) emissions in California, to be implemented in 2012. This GHG emissions cap-and-trade system should include the electricity sector.

6. We recommend that, for the electricity sector, ARB establish the compliance obligation in the GHG emissions cap-and-trade system on the entities that deliver power to the California electricity grid, as described in this decision.

7. We recommend that ARB regulate the emissions associated with multijurisdictional utilities' deliveries of electricity to the California grid on a retail provider basis, with GHG emissions attributed based on the proportional share of their electricity sales that are made in California.

8. We recommend that at least some portion of the GHG emission allowances available to the electricity sector be auctioned, with all ~~at least some portion~~ of the proceeds from the auctioning of allowances for the electricity sector being used in ways that benefit electricity consumers in California.

9. We recommend that, for the natural gas sector, ARB rely on programmatic measures to achieve emission reductions and not include the natural gas sector in a multi-sector GHG emissions cap-and-trade system at this time. It may be appropriate to include the natural gas sector in a cap-and-trade program at a later date.

This order is effective today.

Dated: _____, at San Francisco, California.

CERTIFICATE OF SERVICE

I hereby certify that I have this day re-served a true copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY and SOUTHERN CALIFORNIA GAS COMPANY ON PROPOSED DECISION** on each party named in the official service list for proceeding **R.06-04-009** by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey, and Administrative Law Judges Amy C. Yip-Kikugawa, Charlotte TerKeurst, and Jonathan Lakritz.

Executed this 29th day of February 2008 at San Diego, California.

/s/ Susan A. Long _____ _____
Susan A. Long

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TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS