

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
(February 16, 2006)

**PRE-WORKSHOP COMMENTS OF THE
CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES
ON 2008 RPS MARKET PRICE REFERENT**

March 6, 2008

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The Center for Energy Efficiency and Renewable Technologies (CEERT) respectfully submits its Pre-Workshop Comments on 2008 Market Price Referent (MPR) for the Renewables Portfolio Standard (RPS) Program. These comments are timely filed and served on the service lists for Order Instituting Rulemaking (R.) 06-02-012 and R.06-05-027 pursuant to the Administrative Law Judge's (ALJ's) Rulings issued in this proceeding on February 8, 2008 (February 8 ALJ's Ruling) and on February 26, 2008.¹

I.

GUIDANCE FOR COMMENTS

The February 8 ALJ's Ruling includes "Guidance for Comments" to be provided on "potential modifications to the market price (MPR) methodology, inputs, and assumptions prior to the calculation of the 2008 MPR."² This "guidance" lists the principles and applicable decisions and resolutions to which any proposed modification to the MPR methodology must adhere or reference.

CEERT believes that these "guiding" principles and legal authority require modification to reflect current law and an ongoing need for accuracy and transparency in input assumptions.

¹ On February 26, 2008, by electronic mail, distributed to the service lists in R.06-02-012 and R.06-05-027 by Pacific Gas and Electric Company (PG&E), ALJ Simon extended the time to file these pre-workshop comments from February 28 to March 6, 2008.

² February 8 ALJ's Ruling, at pp. 1, 4.

CEERT, therefore, asks that the list of principles and applicable orders included in the February 8 ALJ's Ruling be modified as follows, with changes indicated in bold and bold strikethrough:

“Any proposed modification to the MPR methodology, assumptions, and/or inputs should:

- **be consistent with the functions of the MPR,³ as modified by SB 1036,**
- be consistent with MPR guiding principles outlined in D.05-12-042,
- **ensure accuracy, transparency, and uniformity in inputs, assumptions, and results,⁴**
- explain the policy basis for the proposal, **including consistency with the Energy Action Plan II and 2008 EAP Update;⁵**
- include supporting documentation; and
- if relevant, include a modified version of the 2007 MPR model that reflects the proposed modifications, which must be highlighted within the modified version.

“All comments should, as appropriate, refer to the decisions and resolutions implementing the MPR to date. These are:

- D.04-06-015 (establishing initial MPR methodology);
- Resolution E – 3942 (implementing 2004 MPR methodology);
- D.05-12-042 (stabilizing MPR methodology);
- Resolution E-3980 (implementing 2005 MPR);
- Resolution E-4049 (implementing 2006 MPR);
- D.07-09-024 (authorizing use of GHG adder for 2007 MPR);
- ~~and~~
- **D.07-09-040 (adopting the MPR model and time of delivery (TOD) factors for certain qualifying facility (QF) pricing mechanisms);**
- Resolution E-4118 (implementing 2007 MPR methodology, including GHG adder);;
- ~~and~~
- **D.08-02-010 (clarifying use and function of MPR).”⁶**

These modifications are necessary to recognize the significant change, which has occurred in the original, central function of the MPR (as an allocation point for supplemental

³ D.05-12-042, at pp. 4-7.

⁴ The Commission has made clear that uniformity, transparency, and, where appropriate, simplicity are the overarching guiding principles for all aspects of RPS-compliant planning and procurement. See, e.g., D.08-02-008, at pp. 22, 37-38, 49; D.07-07-027, at p. 19.

⁵ The Commission has determined that procurement policies, including pricing and contracting options, should not only be consistent with applicable law (including existing Commission decisions), but also “the policy goals articulated in our Energy Action Plan (EAP II).” (D.07-09-049, at pp. 5-6.)

⁶ Basic text quoted from page 5 of the February 8 ALJ's Ruling, at p. 5, with original footnotes omitted. Added language or modification indicated in bold or bold strikethrough.

energy payments (SEPs)) resulting from SB 1036, as well as recent Commission decisions, which have added to, as well as confirmed, the Commission's central policies and guidelines applicable to RPS Program implementation generally and the MPR specifically. CEERT, therefore, asks that its recommended changes above be made to "guidance" on these comments and this process in general.

In addition, there has been no opportunity, and none has yet to be provided, for parties to be heard on the issue of the impact of SB 1036 on the methodology, calculation, or function of the MPR. While the February 8 ALJ's Ruling references SB 1036 for the proposition that it effected changes to "funding above-market costs,"⁷ this statement is offered without stakeholder input and does not definitively resolve the impact of this funding change on the function of the MPR. The February 8 ALJ's Ruling also overlooks recent Commission decisions that have linked the MPR to other procurement (both renewable and non-renewable), further defined the goals for RPS Program implementation,⁸ and clarified the use of the MPR.⁹ Finally, while the recently issued Second Amended Scoping Memo and Ruling of Assigned Commissioner (Scoping Ruling), includes the general issue of "exploring changes in the MPR methodology for 2008 and later years,"¹⁰ no process for addressing "changes" resulting from SB 1036 as to the function or use of the MPR is provided.

Because SB 1036, as well as other recent regulatory actions and policies, directly affect the application and function of the MPR, CEERT, therefore, believes that any final decision confirming modifications to or application of the MPR methodology must only be made once all stakeholders have also been given the opportunity to be heard on the issues of the impact on the

⁷ February 8 ALJ's Ruling, at n.3, p.3.

⁸ See, e.g., D.08-02-008; D.07-07-027. See also, 2008 Energy Action Plan Update.

⁹ D.08-02-010, at p. 14, n. 15 (p. 14), Ordering Paragraph 1, at p. 14.

¹⁰ R.06-02-012, Second Amended Scoping Ruling, at p. 9.

MPR of SB 1036 and recent Commission decisions. CEERT offers a proposal to that end in the final section of these comments.

II.

MPR METHODOLOGY AND INPUT SUBJECTS FOR COMMENT

Based on the existing MPR methodology, the list of “non-gas methodology and inputs” and “gas methodology and inputs” included in the February 8 ALJ’s Ruling are certainly among the issues relevant to a modification of the existing MPR methodology. CEERT looks forward to reviewing analysis and responses offered on these issues and discussing that input at the upcoming workshop.

The February 8 ALJ’s Ruling, however, also invites parties to identify “any other topic” that should be considered at the workshop and “justify its inclusion.”¹¹ While CEERT strongly believes that parties must be given the opportunity to address the issue of the MPR’s use and function, as described above, CEERT recognizes that this topic may not be well suited for the workshop, as it is currently planned. CEERT, therefore, recommends (as discussed further below) that parties be given the opportunity to submit briefs on this issue, in addition to any post-workshop comments, all of which will serve to more fully inform a final decision by the Commission on any modification to or application of the MPR methodology for 2008 and beyond.

As to the workshop itself, CEERT recommends that two topic areas be added. As to the first topic area, in D.05-12-042, the Commission directed the use of “utility-specific” time of delivery (TOD) profiles, as part of the adopted MPR methodology, to reflect the value of electricity provided to the utility over the different hours of the year.¹² D.05-12-042 further

¹¹ February 8 ALJ’s Ruling, at pp. 10, 11.

¹² D.05-12-042, at p. 20.

concluded that “the TOD factors should be approved by the Commission during the review of the utilities’ short-term RPS plans and proposed RFOs.”¹³ This step was taken, however, with the expectation that the “reasonableness” of the utilities’ individual TOD profiles would be evaluated and the subject of a benchmarking study in the following year.¹⁴

Utility-specific TOD profiles and factors have been approved by the Commission in subsequent decisions adopting the utilities’ yearly RPS plans, including, most recently, D.08-02-008 for the 2008 RPS Plans. However, to CEERT’s knowledge, no reasonableness evaluation or benchmarking study has been undertaken or adopted by the Commission, and TOD profiles and factors continue to vary between utilities and to be updated without review, even though the TOU factors used in the MPR model now have wider application. Specifically, as part of the Market Index Formula (MIF) applied to QF procurement pricing, the Commission adopted “the TOD factors used in calculating the MPR.”¹⁵ In doing so, the Commission, however, indicated that “updates to the TOU/TOD factors and periods” might be necessary in a “subsequent proceeding.”¹⁶

The Commission’s overarching guiding principles for RPS implementation have long focused on uniformity and transparency, all of which, along with verifiability, are particularly important in developing any methodology that may be used to evaluate pricing reasonableness.¹⁷ Under these circumstances, and given this current consideration of modifications to the MPR, CEERT believes that an examination of the utility-specific TOD profiles and TOD factors in the context of the MPR methodology is long overdue. For this reason, CEERT asks that interested parties be given the opportunity to address this issue at the upcoming workshop, at the very least

¹³ D.05-12-042, at p. 22.

¹⁴ D.05-12-042, at p. 22.

¹⁵ D.07-09-040, at p. 75.

¹⁶ D.07-09-040, at p. 75.

¹⁷ See, n. 4, *supra*.

to identify a process or schedule for initiating a benchmarking study of TOD factors and a uniform basis for evaluating their reasonableness, including any updates.

Finally, as long as the MPR remains based on a brown-power (non-renewable) proxy, it will continue to fail to serve as an appropriate benchmark or referent for renewable resource costs, operations, or benefits. While the inclusion of a greenhouse gas (GHG) adder seeks to address this deficiency of the MPR to some extent, it still captures only one externality value of renewables. For this reason, the MPR workshop should provide the opportunity for parties to discuss and provide input on other externality values of renewables that should be reflected in this pricing “referent.”

III. BRIEFING OF LEGAL AND POLICY ISSUES

In D.08-02-010, in addressing limited RPS tariffs adopted in D.07-07-027, the Commission clarified that the MPR “is not intended to serve as either the floor or ceiling price paid for renewables procurement generally.”¹⁸ Further, while citing the RPS law for the proposition that a “price at or below the MPR is per se reasonable,” the Commission noted that a “price above the MPR” could also be reasonable and “is not per se unreasonable.”¹⁹

The function of the MPR, especially with the advent of SB 1036 and the return of SEP funds to the utilities, is of singular importance, especially as to the extent and effect it will have on future RPS procurement and compliance. In the Second Amended Scoping Memo and Ruling of Assigned Commissioner issued on February 25, 2008, the general issue of “exploring changes in the MPR methodology for 2008 and later years” is included, but no specific process for addressing the implications of SB 1036 outside of this workshop process is provided.²⁰

¹⁸ D.08-02-010, at p. 14.

¹⁹ D.08-02-010, n. 15, at p. 14.

²⁰ R06-02-012 Second Amended Scoping Ruling, at pp. 9-10.

While CEERT appreciates that there may exist statutory limits on how the MPR is calculated and applied within the context of the RPS Program, CEERT believes it is essential for the Commission to offer parties the opportunity to address changes either in the MPR methodology or its application that may be permitted under the law. The Workshop forum, which will focus on factual input assumptions, is not sufficient alone to accomplish this task.

To that end, CEERT, therefore, requests that legal briefs on the MPR and its application to RPS procurement, in particular, with reference to the new “cost limitation” assigned to each utility by SB 1036, be added as a task for the Second Quarter 2008 in addition to post-workshop comments and reply comments. The filing date for such briefs should be at least two weeks after post-workshop comments are due.

CONCLUSION

CEERT looks forward to participating in the upcoming workshop on modifications to the MPR methodology. CEERT urges the Commission, however, to adopt its recommendations to changes and additions to that process and the “guidance” for this effort as described herein.

Respectfully submitted,

March 6, 2008

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CERTIFICATE OF SERVICE

I, Sara Steck Myers, am over the age of 18 years and employed in the City and County of San Francisco. My business address is 122 - 28th Avenue, San Francisco, California 94121.

On March 6, 2008, I served the within document **COMMENTS OF THE CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES ON ON 2008 RPS MARKET PRICE REFERENT**, in R.06-02-012, with prescribed electronic service pursuant to Rule 1.10 of the Commission's Rules of Practice and Procedure and the ALJ's Rulings of February 8 and 26, 2008, on the service lists in R.06-02-012 and R.06-05-027, and same-day, separate delivery by U.S. Mail of hard copies to Assigned Commissioner Peevey and Assigned ALJ Simon, at San Francisco, California.

Executed on March 6, 2008, at San Francisco, California.

 /s/ SARA STECK MYERS
Sara Steck Myers

**R06-02-012 and R06-05-027
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March 6, 2008**

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