



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

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Order Instituting Rulemaking  
Regarding Policies, Procedures and Rules for  
the California Solar Initiative, the Self-  
Generation Incentive Program and Other  
Distributed Generation Issues.

RULEMAKING 08-03-008  
(Filed March 13, 2008)

**APPLICATION OF THE UTILITY REFORM NETWORK  
FOR REHEARING OF DECISION 09-12-047  
CONCERNING THE SGIP BUDGET FOR 2010 AND 2011**



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Pursuant to Public Utilities Code §1731 and Rule 16.1 of the Commission's Rules of Practice and Procedure, The Utility Reform Network (TURN) submits this Application for Rehearing of Decision No. 09-12-047, adopted on December 17, 2009 and mailed on December 24, 2009. This application is timely filed on or before January 25, 2010.

**1. PROCEDURAL AND LEGAL SUMMARY**

**1.1. Background and Procedural Summary of SB 412 and D.09-12-047**

SB 412 (Stats. of 2009, Chap. 182), which was signed into law on October 11, 2009, amended Public Utilities Code § 379.6 to allow the Commission to “authorize the **annual collection** of no more than the amount **authorized** for the self-generation incentive program in the 2008 calendar year” in 2010 and 2011.<sup>1</sup> SB 412 extends administration of the program until January 1, 2016, and limits program eligibility to distributed energy resources that the Commission determines, in consultation with the California Air Resources Board, will achieve reductions in greenhouse gas emissions. According to the legislation, on

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<sup>1</sup> §379.6(a)(1) now states in full: “The commission, in consultation with the Energy Commission, may authorize the annual collection of no more than the amount authorized for the self-generation incentive program in the 2008 calendar year for the self-generation incentive program in the 2008 calendar year, through December 31, 2011. The com shall require the administration of the program for distributed energy resources originally established pursuant to Chapter 329 of the Statutes of 2000 until January 1, 2016. On January 1, 2016, the commission shall provide repayment of all unallocated funds collected pursuant to this section to reduce ratepayer costs.”

January 1, 2016, the Commission shall provide repayment of all unallocated funds collected pursuant to this section to reduce ratepayer costs.

In decision 09-12-047 the Commission did indeed authorize the collection in 2010 and 2011 of \$83 million annually for SGIP, the annual budget authorized for 2008 in D.08-01-029.<sup>2</sup> However, the Commission additionally authorized the utilities to file annual advice letters to collect “previously authorized” carryover funding. The Commission ordered each utility to:

... submit an annual advice letter request in their applicable ratemaking proceeding, until December 31, 2015, for Commission review in order to collect from ratepayers the amount of previously authorized Self-Generation Incentive Program carryover funding committed, reserved and/or spent in that calendar year, for collection in rates the following calendar year.<sup>3</sup>

The Commission thus authorized the utilities to collect and spend up to an additional \$310 million in “total authorized carryover” funds. These carryover funds are surplus amounts from budgets authorized for 2001-2009. The Total Authorized Carryover includes not only about \$154.6 million in “collected carryover” – money **already collected from ratepayers** and held by the utilities in appropriate accounts, but also about \$155.6 million in “uncollected carryover”

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<sup>2</sup> D.09-12-047, Ordering Paragraph 1, p. 19.

<sup>3</sup> D.09-12-047, Ordering Paragraph 3.b, p. 20.

– money **never previously collected** from ratepayers but simply tracked on paper.<sup>4</sup>

The decision thus authorizes the utilities **to collect** from ratepayers an additional amount of approximately \$321.6 million over the next six years.

## **1.2. Summary of Legal Argument**

TURN argues that Decision 09-12-047 is illegal because the authorization for the utilities to collect approximately \$155 million in “uncollected carryover” funds violates recently passed SB 412. This authorization appears to conflict with the plain language of Public Utilities Code §379.6(a)(1), which prohibits collecting more than the amount authorized in 2008. However, even if there is ambiguity in the phrase “amount authorized,” the decision conflicts with the legislative intent of SB 412 as evidenced in several legislative analyses, which show that the legislature intended the 2008 budget of \$83 million plus any already-collected surpluses to be the cap on any future rate impacts.

## **2. Decision 09-12-047 Violates the Plain Language of §379.7(a)(1) and Conflicts with the Intent of the Legislature**

### **2.1. The Plain Language of the Law Limits Increases in “Collection” to the Amount Authorized in 2008**

The Decision appears to violate the plain language of SB 412, which limited all future collections for the self-generation incentive program (“SGIP”) to an amount “not more than the amount authorized for the self-generation incentive program” in 2008, and only for the two additional years of 2010 and 2011.

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<sup>4</sup> The Total Authorized Carryover includes approximately \$154.6 million in funds already collected by the utilities, and an additional \$155.6 million never previously collected from ratepayers. See, D.09-12-047, *mimeo.* p. 7-9.

The plain language of SB 412 limits the “annual collection” of funds from ratepayers. TURN does not dispute that the statutory language allows the Commission to authorize the utilities to expend any previously collected funds that are sitting in the bank, the so-called “collected carryover.”

However, authorizing the utilities to file advice letters anytime until 2015 to “collect” previously authorized funds violates the plain meaning of the statute, which allows only for annual collections in 2010 and 2011.

The Commission stated in D.09-12-047 that the amount “authorized for 2008” included carryover funding consisting of “any unspent SGIP non-PV funds from prior years.”<sup>5</sup> The Commission argues that:

The statute speaks to how much the Commission can authorize for collection in 2010 and 2011, but it does not speak to previously authorized amounts. Uncollected carryover funding was previously authorized by the Commission and the utilities do not need authorization to collect these funds, although the decision provides Commission guidance on the use of these funds and requires an advice letter for Commission review to put the uncollected carryover funds into rates if and when the funds are actually needed.<sup>6</sup>

The logical outcome of the Commission’s interpretation of the statute is that the utilities could collect an additional \$155 million per year in 2010 and 2011, based on the notion that these uncollected balances were part of the authorization in 2008. This reasoning violates not just a canon of statutory construction, but the very purpose of statute itself. A new statute trumps prior administrative rule. Indeed, one of the purposes of legislation may be to change existing rules adopted by administrative bodies or agencies.

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<sup>5</sup> D.09-12-047, *mimeo.* at 11, quoting D.08-01-029, *mimeo.* at 7.

<sup>6</sup> D.09-12-047, *mimeo.* at 17.

The Commission's reasoning in D.09-12-047 attempts to subvert exactly this fundamental notion. The law states that the Commission may not authorize "the annual **collection**" for SGIP of more than a specified amount going forward. The Commission is saying, however, that if we had previously authorized collections, we get to collect them anyway in 2010-2015. The legislative injunction to collect no more does not apply.

This interpretation has no legal or logical basis. When the legislature restricts "the annual collection" of ratepayer funds for a program, such a restriction supercedes any past authorizations. If funds had not been collected in the past, the Commission cannot now decide to collect them going forward. The legislative restriction on future collections trumps any historical authorizations by the Commission. Simply put, if the law now states that the Commission cannot authorize additional **collection**, the Commission cannot simply state that "the utilities do not need authorization to collect these funds" because we have authorized it in the past.

## **2.2. The Decision Violates the Legislative Intent to Limit New Rate Collections to an Amount no Greater than \$83 Million Per Year**

The Commission pins its decision on the argument that the term "amount authorized for the [SGIP] in the 2008 calendar year" includes all previous budget surpluses, whether collected from ratepayers or not. Even if one believes that there is ambiguity in the statute concerning the phrase "amount authorized," the legislative history shows that the legislature never intended the utilities to collect an additional \$155 million in "uncollected carryover" funds.

The legislative history indicates that the statute was modified four times and that Senate and Assembly staff produced eleven legislative analyses.<sup>7</sup> The statute as originally introduced on February 26, 2009 did not contain the present language limiting future collections, but rather required the Commission to administer the SGIP program through 2012. The Senate Committee analysis from April 21, 2009 states the following regarding the ratepayer impacts of the bill as proposed:

This bill **does not increase funding** for the SGIP (currently \$83 million annually) which is derived from a surcharge on all ratepayers except residential ratepayers who limit usage to tiers 1 and 2. The CPUC has the broad authority to establish the surcharge; this bill does not change that authority.

However, because the bill exempts all CARE customers from the surcharge there would be a negligible shift of the surcharge from CARE customers to the remainder of the residential ratepayer class.<sup>8</sup>

Another Senate Committee analysis of May 4, 2009 further explained that the cost impact of SGIP would \$83 million per year:

The program is budgeted at \$83 million per year, supported by electricity ratepayer funds. SB 412 would extend the sunset of the existing Self-Generation Incentive Program for an additional year, to 2013. Based on existing program size, this would

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<sup>7</sup> Available at <http://info.sen.ca.gov/cgi-bin/postquery>

<sup>8</sup> SB 412 Analysis, Senate Energy, Utilities and Communications Committee, Kellie Smith, April 21, 2009 (emphasis added), available at [http://info.sen.ca.gov/pub/09-10/bill/sen/sb\\_0401-0450/sb\\_412\\_cfa\\_20090417\\_154423\\_sen\\_comm.html](http://info.sen.ca.gov/pub/09-10/bill/sen/sb_0401-0450/sb_412_cfa_20090417_154423_sen_comm.html)

result in **costs to electricity ratepayers of \$83 million** in 2012.<sup>9</sup>

This language concerning an \$83 million annual impact was repeated in subsequent Senate committee and floor analyses.

The bill was amended on May 28, 2009 to “require” the collection of funding through 2011, but without mentioning any cost limit on the amount of funds collected. The subsequent Assembly Committee analysis, dated June 25, 2009 specifically discussed the potential cost impacts of SGIP:

5) Ratepayers, the deep pocket: The utilities have been collecting a surcharge for the SGIP and it has not been fully expended. The current unexpended balance is about \$200 million. Although it has a substantial surplus, this bill would require the PUC to continue collecting the surcharge through December 31, 2011, and require the PUC to administer the program until all funds collected have been allocated as incentives. The PUC budgeted for (or allowed the utilities to collect) \$83 million in 2008. To ensure the PUC doesn't require the collection of a windfall amount in order to perpetuate the SGIP beyond demand for the program, this committee may wish to authorize the commission to collect not more than \$83 million per year for the program through December 31, 2011.<sup>10</sup>

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<sup>9</sup> SB 412 Analysis, Senate Appropriations Committee, May 4, 2009 (emphasis added), available at [http://info.sen.ca.gov/pub/09-10/bill/sen/sb\\_0401-0450/sb\\_412\\_cfa\\_20090504\\_112959\\_sen\\_comm.html](http://info.sen.ca.gov/pub/09-10/bill/sen/sb_0401-0450/sb_412_cfa_20090504_112959_sen_comm.html)

<sup>10</sup> SB 412 Bill Analysis, Assembly Committee on Utilities and Commerce, Gina Adams, June 25, 2009 (emphasis in original), available at [http://info.sen.ca.gov/pub/09-10/bill/sen/sb\\_0401-0450/sb\\_412\\_cfa\\_20090625\\_181519\\_asm\\_comm.html](http://info.sen.ca.gov/pub/09-10/bill/sen/sb_0401-0450/sb_412_cfa_20090625_181519_asm_comm.html)

The bill was subsequently amended on July 14, 2009 to add the limiting language specifying that the annual collection in 2010 and 2011 shall be “not more than” the amount authorized in 2008.

It is clear from the language in these initial analyses, as well as language in subsequent analyses after the bill was modified to conform with present language, that the legislature intended §379.6(a)(1) to limit the rate increases in 2010 and 2011 to no more than \$83 million.

The Assembly Committee analysis of July 2, 2009 states that the bill will “cap annual collection at the amount collected in 2008 (\$83 million).” A subsequent Assembly Committee analysis of August 18, 2009 contains representative language stating that the bill “caps annual collection of SGIP funds at the amount collected in 2008 (\$83 million).”

The Commission might argue that the “unexpended balance” includes the \$155.6 not yet collected from ratepayers. But such an argument flies in the face of substantial evidence that the legislature was concerned about amounts “**collected**” from ratepayers, not about the arcane technicalities of memorandum versus balancing account treatment of authorized budgets.

The legislative history is unambiguous that the legislative intent behind the phrase “amount authorized in 2008” was to limit any future annual *collections* to \$83 million.<sup>11</sup> The legislative history evidences the intent of the legislature to limit

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<sup>11</sup> Indeed, SB 412 puts a *cap* on amounts collected and sunsets the collection date, but does not at all mandate a minimum collection level.

all *collections* to this amount, irrespective of whether one defines the money as new authorization or “carry over.”

The legislature was aware of the “current unexpended balance” due to surcharges already “collected” by the utilities, and the legislature determined that this amount, together with the additional \$83 million in 2010 and 2011, was sufficient to fund the SGIP program. Indeed, the legislature extended the program for an additional four years to allow the spending of funds collected through 2011.

In order to collect the ‘uncollected carryover’ via subsequent advice letters, the utilities will have to “collect” more money from ratepayers for SGIP. Regardless of whether this money was previously “authorized” or not, it was clearly not the intent of the legislature to authorize such additional collections. Indeed, it was clearly the intent of the legislature to preclude any such additional collections by placing a cap on the annual collections in 2010 and 2011.

### **3. Conclusion**

The amount of uncollected carryover funding authorized for collection in D.09-12-047 is almost double the amount that the legislature intended to be collected from ratepayers in 2010 and 2011. Even if one accepts the argument that technically the amount “authorized” for 2010 includes unspent “collected carryover” funds from the prior eight years, the legislative history is unambiguous that the legislature never intended to *double* the ratepayer impact of the SGIP funding authorization by including “uncollected carryover.”



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 January 25, 2010 I served the attached:

**APPLICATION OF THE UTILITY REFORM NETWORK  
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on all eligible parties on the attached lists **R.08-03-008** by sending said document by electronic mail to each of the parties via electronic mail, as reflected on the attached Service List.

Executed this January 25, 2010, at San Francisco, California.

/S/  
Larry Wong

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