

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



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Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 08-08-009
(Filed August 21, 2008)

**REPLY OF ALLIANCE FOR RETAIL ENERGY MARKETS TO RESPONSE OF
SOUTHERN CALIFORNIA EDISON COMPANY TO MOTION FOR OFFICIAL
NOTICE OF SENATE BILL 695 AUTHOR'S LETTER REGARDING LEGISLATIVE
INTENT OF PUBLIC UTILITIES CODE SECTION 365.1(c)**

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January 6, 2011

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I. INTRODUCTION

In accordance with Rule 11.1(f) of the Commission's Rules of Practice and Procedure and with the permission of Administrative Law Judge ("ALJ") Anne E. Simon,¹ the Alliance for Retail Energy Markets ("AReM")² hereby submits this reply to the response of Southern California Edison Company ("SCE") to AReM's December 17, 2010, *Motion for Official Notice of Senate Bill 695 Author's Letter Regarding Legislative Intent of Public Utilities Code Section 365.1(c)*. SCE is wrong both in asserting that Senator Kehoe's letter is not indicative of legislative intent, and in asserting that AReM is "using the letter in a manner that is broader than the Senator intended."³ Notwithstanding SCE's protest, AReM's request for official notice of Senator Kehoe's letter is consistent with the law, and the Commission may give the Senator's

¹ ALJ Simon granted AReM's request for permission to file a reply on December 23, 2010, via email to AReM's counsel of record.

² AReM is a California mutual benefit corporation formed by electric service providers ("ESPs") that are active in California's direct access market. The positions taken in this filing represent the views of AReM and its members but not necessarily the affiliates of its members with respect to the issues addressed herein.

³ SCE Response, p. 2.

statements concerning the legislative intent of Section 365.1(c) the evidentiary weight they deserve, and need not provide opportunity for rebuttal testimony.

II. AREM’S REQUEST FOR OFFICIAL NOTICE OF SENATOR KEHOE’S LETTER IS CONSISTENT WITH THE LAW.

In its response, SCE asserts that “AREM relies solely on a 1979 opinion of the California Court of Appeals” and fails to take into account a more recent relevant 1995 California Supreme Court Decision⁴ Specifically, SCE quotes language from *Quintano v. Mercury Casualty Co*, 11 Cal. 4th 1049, 1062 (1995), to the effect that the California courts generally do not give consideration to statements made by a bill’s author in determining legislative intent. SCE then conveniently omits any reference to two opinions issued subsequent to *Quintano*, namely *Sierra Club v. California Coastal Comm’n*, 35 Cal. 4th 839 (2005), and *Gavaldon v. DaimlerChrysler Corp.*, 32 Cal. 4th 1246 (2004), in which a bill author’s letter was accepted as evidence of legislative intent.⁵ In *Gavaldon*, the Supreme Court noted that the bill author’s letter was particularly helpful in determining legislative intent given the dearth of other legislative history materials concerning the particular statutory provision in question.⁶ That is precisely the situation that the Commission faces in construing the “same requirements” language in Section 365.1(c), as there is virtually no discussion of that provision in the Assembly and Senate analyses of SB 695.

What should be taken from all of the citations offered in AREM’s motion and in SCE’s response is that there is a plethora of precedent with respect to whether a bill author’s letter should be deemed indicative of legislative intent; AREM strongly suggests, however, that the

⁴ SCE Response, p. 3.

⁵ *Sierra Club v. California Coastal Comm’n*, 35 Cal. 4th 839, 853; *Gavaldon v. DaimlerChrysler Corp.*, 32 Cal. 4th 1246, 1257-1258.

⁶ See *Gavaldon v. DaimlerChrysler Corp.*, 32 Cal. 4th at 1257-1258 and fn. 3.

Commission should approve the AReM's motion so that it may regard Senator Kehoe's letter in the spirit with which it was offered – to remind the Commission that:

SB 695's "same requirements" language cited above does not reverse or rewrite the preexisting statutory framework. Nor is it intended to circumscribe the Commission's authority to craft appropriate policies and rules by which the ESPs will meet the State's RPS, RA, and GHG goals so long as they meet the same State's important reliability and environmental goals. Imposing identical implementation details for RPS, RA or GHG reduction programs on both ESPs and IOUs ignores important distinctions between competitive and regulated entities that this Legislature created and recognizes.⁷

SCE also quotes language in *Kleffman v. Vonage Holdings Corp.*, 49 Cal. 4th 334, 348 (2010), stating that the Court will not consider statements of a bill's author (or any other legislator) "unless they reiterate legislative discussion and events leading up to the bill's passage." Yet that is precisely what Senator Kehoe does in her letter, where she states:

The intent of this statutory language is to ensure that with the lifting of the direct access suspension, the Electric Service Providers ("ESPs") would meet California's existing environmental and reliability programs...In fact, I insisted that ESPs not be let "off-the-hook" with respect to doing their share to help meet the State's environmental and reliability goals."

Senator Kehoe's statement that she "insisted that ESPs not be let "off-the-hook" with respect to doing their share to help meet the State's reliability and environmental goals"⁸ directly refers to the discussion and events leading up to the bill's passage. Thus, the statements regarding legislative intent that Senator Kehoe makes in the letter are not only highly relevant but also the very type of statements that the Supreme Court considers in the course of statutory construction.

⁷ See Senator Kehoe Letter, p. 2.

⁸ See Senator Kehoe Letter, p. 2.

III. THERE IS NO BASIS FOR SCE’S ASSERTION THAT AREM’S REQUEST FOR OFFICIAL NOTICE OF THE SENATOR KEHOE’S LETTER IS INCONSISTENT WITH THE SENATOR’S INTENDED USE OF THE LETTER.

In its response, SCE claims that “AREM is using this letter in a manner that is broader than the Senator intended.” However, the opening paragraph of Senator Kehoe’s letter states that she wrote the letter precisely for the reason that AREM requests official notice of the letter: There are pending decisions before the Commission that require interpretation of the “same requirements” provision in Section 365.1(c). Since the purpose of Senator Kehoe’s letter is to shed light on the legislative intent behind that language, taking official notice of the letter is entirely consistent with Senator Kehoe’s intent.

SCE further claims further that Senator Kehoe’s letter “was not intended to imply that the ESPs should be ‘off-the-hook’ with respect to restrictions such as TREC usage limits.” AREM’s motion does not claim that Senator Kehoe’s letter referenced this issue. Whether TREC limitations should or should not be imposed on ESPs is a decision to be made by the Commission, and Senator Kehoe’s letter expresses no opinion whatsoever about how the Commission should rule in that regard. What the Senator’s letter does do is inform the record that the Commission need not abandon the “same deliberative path that it has followed in the past by establishing fair and thoughtful policies and regulations that acknowledge the differences between the ESPs, the IOUs and their customers, while ensuring that both types of entities meet the State’s important reliability and environmental goals.”⁹

With respect to the imposition of TREC usage limits, AREM has consistently advocated that there should be no TREC limitations imposed on any LSE, but that the Commission is well within its consumer protection jurisdictional authority to choose to impose such limitations on the IOUs while not imposing the same restrictions on ESPs, over whom the Commission’s

⁹ See Senator Kehoe Letter, p. 3.

consumer protection jurisdiction is statutorily different. AReM believes that Senator Kehoe's letter provides important guidance that SB 695 does not restrict the Commission from agreeing with that position. In summary, Senator Kehoe's letter provides valuable insights into the intent behind Section 365.1(c), and that the Commission's deliberations and the public interest would be best served by consideration of the Senator's letter.

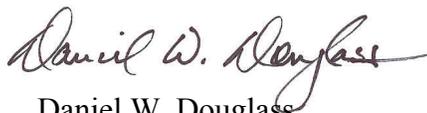
IV. THERE IS NO NEED TO ALLOW PARTIES TO SUBMIT REBUTTAL TESTIMONY IN RESPONSE TO SENATOR KEHOE'S LETTER.

As noted above, SCE further asks, almost in passing, that should the Commission grant AReM's motion, "that the Commission provide all parties with an opportunity to submit rebuttal evidence into the record as well."¹⁰ However, the Senator's words speak for themselves, and allowing parties to attempt to "rebut" a letter offered by the author of SB 695 that expresses her intent should be rejected.

V. CONCLUSION

For the reasons above, the Commission should take official notice of the letter from Senator Kehoe to the Commissioners dated December 7, 2010, and should give the letter the weight and deference it deserves as official correspondence from the author of SB 695 regarding the legislative intent of new Section 365.1(c).

Respectfully submitted,



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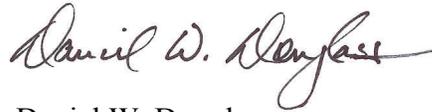
January 6, 2011

¹⁰ SCE Response, p. 3.

VERIFICATION

I, Daniel Douglass, am counsel for the Alliance for Retail Energy Markets and am authorized to make this Verification on its behalf. I declare under penalty of perjury that the statements in the foregoing copy of Reply of Alliance For Retail Energy Markets to Southern California Edison's Response to Motion For Official Notice Of Senate Bill 695 Author's Letter Regarding Legislative Intent Of Public Utilities Code Section 365.1(c), filed in R.08-08-009, are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

Executed on January 6, 2011, at Woodland Hills, California.



Daniel W. Douglass
DOUGLASS & LIDDELL

Attorney for the
ALLIANCE FOR RETAIL ENERGY MARKETS

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing ***Reply of Alliance for Retail Energy Markets to Southern California Edison Company's Response to Motion for Official Notice of Senate Bill 695 Author's Letter Regarding Legislative Intent of Public Utilities Code Section 365.1(c)*** on all parties of record in proceeding ***R.08-08-009*** by serving an electronic copy on their email addresses of record and by mailing a properly addressed copy by first-class mail with postage prepaid to each party for whom an email address is not available.

Executed on January 6, 2011, at Woodland Hills, California.



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