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

Order Instituting Rulemaking on the)
Commission's Own Motion into combined) Rulemaking 08-06-024
heat and power Pursuant to Assembly Bill)
1613)
_____)

**Response of
San Joaquin Refining Company, Inc.
to the Motion for a Stay
of Decision 09-12-042**

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On Behalf of
SAN JOAQUIN REFINING COMPANY, INC.

June 11, 2010

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PUBLIC UTILITIES COMMISSION
OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking on the)
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to the Motion for a Stay
of Decision 09-12-042**

Pursuant to Rule 11.1 of the Commission’s Rules of Practice and Procedure, San Joaquin Refining Company, Inc. (SJR) respectfully responds to the Motion for a Stay of Decision 09-12-042 (Motion) filed in this proceeding on May 27, 2010 by three investor-owned utilities (IOUs). In this proceeding, the Commission is attempting to implement Assembly Bill 1613 (AB 1613), which the Legislature enacted in order to promote the development in California of small combined heat and power (CHP) facilities with generating capacities of 20 megawatts (MW) or less.

SJR has participated in this proceeding as a result of its plans to build a highly-efficient, AB 1613-compliant CHP facility at its refinery in Bakersfield, California. SJR is now moving forward with the permitting processes and interconnection studies for its project, and is ready to contract with a California utility to sell the firm power output from the project. SJR’s small CHP facility is an essential element of its plans to meet both new local air quality regulations and California’s anticipated regulation of GHG emissions beginning in 2012. Time is of the essence in resolving the final hurdles to implementing AB 1613, if the program is to provide a viable means for California institutions, commercial facilities, and industrial plants, such as SJR’s refinery, to use CHP as a principal strategy to reduce their emissions of criteria air pollutants and greenhouse gases, before AB 32 regulation of greenhouse gases begins in 2012.

This is not the first attempt by these IOUs to stay D. 09-12-042. The IOUs asked to stay D. 09-12-042 for ninety days in a motion filed on January 20, 2010. The Commission rejected this motion as moot in D. 10-04-055, because the Commission already had granted the IOUs a delay until June 21, 2010 in the requirement that they file tariffs and standard contracts implementing D. 09-12-042.¹ SJR previously responded in opposition to the IOUs' first attempt to stay D. 09-12-042, and, as set forth below, continues to believe that the balance of interests weighs against any further delay in this important program to reduce GHG emissions.

Staying an adopted Commission order is an extraordinary event, and requires an extraordinarily compelling showing. The Commission's authority to grant a stay is discretionary under P.U. Code Section 1735, and a party requesting a stay must surmount several high hurdles before the Commission will act to stay one of its decisions. In brief, the Commission must find that:

1. the moving party will suffer serious or irreparable harm if the stay is not granted;
2. the moving party is likely to prevail on the merits of the application for rehearing; and
3. the balance of the harm shows that the greater harm will be suffered by the moving party (or the public interest) if the stay is not granted and the decision is later reversed, compared to the harm to the other parties (or the public interest) if the stay is granted and the decision is later affirmed.²

As the first of these hurdles, the parties requesting a stay must show that serious or irreparable harm will result if the order is not stayed. The IOUs' Motion offers no evidence in support of their bald assertion that, if they must sign the adopted AB 1613 contracts, "the Joint Utilities will be forced to execute long-term contracts with above-market pricing."³ There is no basis for this assertion in the record in this proceeding. The pricing for the AB 1613 contract is based on the Commission's adopted Market Price Referent (MPR), which is the long-term

¹ D. 10-04-055, at 3-4.

² Motion at 4, citing D. 08-04-044, at 3.

³ *Ibid.*, at 5.

market price necessary to cover the costs of a new gas-fired combined-cycle power plant built in California.⁴ As set forth in D.09-12-042, a gas-fired combined-cycle is the type of resource that AB 1613 CHP resources will displace.⁵ As a result, basing AB 1613 pricing on the MPR plainly complies with the requirement in AB 1613 that ratepayers must be indifferent to the purchase of power from small CHP, compared to the costs of the resource that the IOUs would otherwise procure.⁶ With pricing based on the adopted Market Price Referent, the Commission's AB 1613 program will not result in above-market costs, and thus will not cause serious or irreparable harm to utility ratepayers.

If there is harm that will result from a stay of D. 09-12-042, the harm will be to utility customers like SJR, who have devoted significant effort and expense to developing AB 1613-compliant small CHP projects as the key element in their plans for complying with evolving air quality and greenhouse gas regulations in California. If the availability of AB 1613 contracts is delayed, such customers may be unable to bring such projects on-line before the initiation of GHG regulations in California, still scheduled for January 1, 2012, with the result that they may incur significant costs to purchase additional emission allowances. More broadly, the public interest will be harmed by a stay, as Californians will be denied, for at least the term of the stay, the environmental benefits of significant reductions in both criteria pollutants and greenhouse gases. Given the often-lengthy time frames for appellate litigation, the IOUs are ingenuous, to say the least, when they argue that a stay will delay the benefits of AB 1613 for just "a little longer."⁷ This is also the IOUs' second request for a stay: the first was for just ninety days; the instant request is of indefinite length. Each time, "a little longer" becomes more protracted.

⁴ The MPR is reviewed and adopted by the CPUC on an annual basis, most recently in Resolution E-4298 (December 17, 2009).

⁵ D. 09-12-042, at 36-37.

⁶ Public Utility Code § 2841(b)(4) states that ratepayers not utilizing small CHP systems should be "held indifferent to the existence of this tariff."

⁷ Motion, at 7.

Attempting to surmount the second hurdle, the IOUs submit that they are likely to prevail at the FERC in their assertion that D. 09-12-042 is preempted by federal law, and that it amounts to an improper attempt by the Commission to set rates for wholesale power sales by public utilities.⁸ Before the FERC, this Commission has strongly asserted a contrary view, in its own petition for a declaratory order.⁹ Obviously, it would be inconsistent with the Commission's position before the FERC for the Commission to agree that the IOUs are likely to prevail on the merits of their legal claims. Furthermore, parties to the FERC proceeding concerning the Commission's petition have suggested another possible outcome that would both avoid the preemption and jurisdictional issues and allow the Commission's AB 1613 program to proceed as adopted: the FERC may find that the CPUC's AB 1613 rate is acceptable as an exercise of the Commission's unquestioned authority under the Public Utilities Regulatory Policies Act to set avoided cost-based rates for qualifying facilities in California.¹⁰ Given this possibility, as well as the Commission's own strongly-held legal position, the IOUs cannot show that their legal claims are likely to prevail.

As the final hurdle to granting a stay, the Commission must address the "balance of harm" that will result from its decision.¹¹ That balance is clear: denying the stay will allow California energy users to proceed with small CHP projects that will provide significant environmental benefits at no above-market cost to ratepayers, while approving the stay will postpone such benefits indefinitely and raise the costs to achieve the state's environmental goals. As was the case earlier this year, the balance of harm and the public interest continue to support

⁸ *Ibid.*, at 5.

⁹ "Petition for Declaratory Order and for Exemption from Paying Filing Fees of the Public Utilities Commission of the State of California" (FERC Docket No. EL10-64, filed May 4, 2010).

¹⁰ See interventions filed June 4, 2010 in FERC docket EL10-64 by SJR, the Attorney General of the State of California, Fuel Cell Energy, and (jointly) the Solar Alliance, the Interstate Renewable Energy Council, the Solar Energy Industries Association, the California Solar Energy Industries Association, and the Vote Solar Initiative.

¹¹ *Ibid.*, at 4.

denial of the IOUs' motion for a stay of D. 09-12-042.

SJR greatly appreciates the Commission's attention to this response, and asks the Commission to reject the IOUs' request for a further stay in D. 09-12-042.

Respectfully submitted,

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