



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Address) R.11-03-012
Utility Cost and Revenue Issues Associated)
with Greenhouse Gas Emissions.) (Filed March 24, 2011)
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PREHEARING CONFERENCE STATEMENT OF
SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)

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Dated: April 21, 2011

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**PREHEARING CONFERENCE STATEMENT OF
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Pursuant to Rule 7.2 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and the Order Instituting Rulemaking referenced herein, Southern California Edison Company (“SCE”) offers the following Prehearing Conference Statement (“PCS”).

I.

INTRODUCTION

On March 30, 2011, the Commission issued an Order Instituting Rulemaking (“OIR”) to address potential utility cost and revenue issues associated with the California Air Resources Board’s (“CARB’s”) greenhouse gas (“GHG”) emissions cap-and-trade program. In Section 3 of the OIR, the Commission states its intent to focus the rulemaking on the following issues: (1) the direction the Commission should give to the electric utilities about the uses of revenues received from auctioning GHG emissions allowances and from the sale of Low Carbon Fuel Standard (“LCFS”) credits (the “Allowance Revenue Issues”) and (2) the utilities’ potential exposure to and management of GHG compliance costs (“GHG Compliance Issues”) and utility participation in the GHG allowance and offset markets (the “GHG Procurement Issues”). The

Commission also states its intent to complete this proceeding by September 30, 2012, while providing that the precise schedule for this proceeding will be discussed at the prehearing conference.¹

In the OIR, the Commission invites the parties to file PCSs addressing the scope and schedule of the proceeding, category, need for hearing, and other procedural issues by no later than April 21, 2011. Accordingly, SCE files this PCS to address the following scoping and scheduling issues:

A. The Commission should remove consideration of GHG Procurement Issues and GHG Compliance Issues from the scope of this OIR and allow these issues to continue to be considered in the long-term procurement plan (“LTPP”) proceeding, Rulemaking (“R.”) 10-05-006.

B. With respect to the Allowance Revenue Issues, the Commission should limit the scope to focus primarily on developing rules and guidance related to using the revenues to mitigate the cost imposed by the GHG cap-and-trade program on California electricity customers through customer bill relief.

C. If the GHG Procurement Issues and the GHG Compliance Issues are considered in this proceeding, the Commission should adopt an accelerated schedule with respect to these issues to give the utilities sufficient time to prepare for the GHG cap-and-trade program.

D. Unless the Commission adopts an interim decision² that adequately resolves the Allowance Revenue Issues for 2012, the Commission should adopt an

¹ OIR, pp. 19-21.

² SCE, Pacific Gas and Electric Company, and San Diego Gas & Electric Company intend to jointly file the *Joint Motion of Pacific Gas and Electric Company (U 39 E), Southern California Edison Company (U 338-E), and San Diego Gas & Electric Company (U 902 E) for Interim Decision to Authorize Use of Greenhouse Gas Allowance Revenues to Reduce 2012 Electricity Rates* (the “Interim Motion”). In the Interim Motion, the joint movants seek an interim decision authorizing the utilities to credit AB 32 GHG allowance revenues directly to retail electricity and gas customers in rates effective January 1, 2012. If adopted by the Commission according to its terms, the interim decision would remain in effect subject to a final decision in this proceeding.

accelerated schedule for resolving the Allowance Revenue Issues prior to the implementation of the Energy Resource Recovery Account (“ERRA”) forecast proceeding rates for 2012.

II.

DISCUSSION

A. The GHG Compliance Issues And GHG Procurement Issues Should Be Addressed In The LTPP Proceeding, Rather Than In This Proceeding

In Section 3.2 of the OIR, the Commission proposes to develop rules and guidance in this Rulemaking that will govern the utilities’ participation in the GHG allowance and offset markets. Section 3.2 of the OIR also provides that the Commission intends to use this Rulemaking to address various aspects of the utilities’ exposure to GHG compliance costs associated with electrical procurement. This includes developing guidance and rules on how utilities should manage their GHG compliance exposure in bilateral contracts and how they should value various GHG compliance products among competing bids.³ While it is crucial that the Commission develop clear guidance on all of these issues, it is more appropriate to handle these issues in the LTPP proceeding for several reasons.

First, GHG Procurement Issues and GHG Compliance Issues must be addressed using the upfront standards framework provided in the LTPP proceeding. Assembly Bill (“AB”) 57, which enabled the utilities to resume their procurement activities after the California energy crisis, established the LTPP framework whereby the Commission reviews and approves the utilities’ procurement plans, and establishes upfront standards and criteria for utilities’ procurement activities in serving their customers. As long as the utilities demonstrate that their

³ OIR, pp. 19-20.

procurement transactions comply with the Commission-approved procurement plans, the transactions are deemed *per se* reasonable and the utility's ability to recover its cost is assured. Because the utilities will need these AB 57 protections when transacting GHG products and this framework is already being implemented in the LTPP proceeding, it is preferable to develop rules related to the procurement of GHG products within the LTPP proceeding.

Likewise, the LTPP proceeding was established in order to develop a comprehensive set of procurement policies, practices and procedures governing the utilities' procurement plans, and to provide the appropriate forum in which to consider the Commission's electricity procurement policies and programs and how to implement them.⁴ The GHG Procurement Issues and GHG Compliance Issues clearly relate to electricity procurement and should, therefore, be brought under the umbrella of the LTPP proceeding. Developing general procurement policies in the LTPP proceeding independent of policies pertaining to the utility participation in the GHG allowance and offset markets would undermine the Commission's goal of developing a comprehensive set of procurement policies in an integrated fashion.

Second, procurement of GHG allowances and offsets is akin to procurement of other commodities already being considered in the LTPP proceeding. The LTPP proceeding is used to develop a procurement framework governing the utilities participation in *any* wholesale commodity markets, such as energy and ancillary services markets, natural gas markets, as well as emissions allowances markets including the sulfur dioxide ("SO₂") and nitrogen oxide ("NO_x") allowances markets. GHG allowances and offsets are very similar, if not the same, as other commodities incrementally consumed in the generation and dispatch of electrical energy. The moment a utility generates or dispatches electricity from a generating station that emits carbon dioxide ("CO₂"), it accrues a corresponding GHG compliance obligation under CARB's

⁴ See R.10-05-006, *Assigned Commissioner and Administrative Law Judge's Joint Scoping Memo and Ruling*, filed December 3, 2010 ("LTPP Scoping Memo"), p. 2.

GHG cap-and-trade program. Therefore, just as the utility would have to purchase fuel when it wants to generate and dispatch its resources, the utility must also purchase corresponding GHG allowances to satisfy its GHG cap-and-trade compliance obligation. The utilities will inevitably need to take the cost of GHG allowances into account when making their generation procurement and dispatch decisions, just like they already take into account the cost of fuel and other emissions products.

Likewise, it is SCE's expectation that the Commission's guidance related to the procurement of GHG compliance products (including not only allowances and offsets, but forwards, futures, options and other hedging products) will not differ fundamentally from guidance related to the procurement of non-GHG products. Utilities will manage their GHG compliance and cost exposure through CARB's quarterly auctions, secondary market transactions and through the use of hedging or similar practices that are already in place or being developed in the LTPP proceeding in the non-GHG context.

Accordingly, there is no need to create a separate forum to develop procurement rules for GHG allowances, offsets and other GHG compliance products, especially when these products are an integral part of the overall electricity generation and dispatch decision-making process. All of the procurement rules for all such commodities involved in electricity generation and dispatch are proposed, reviewed and approved in the LTPP proceeding. Many of the utilities' procurement plan elements for electricity and other commodities will also apply in establishing procurement rules for GHG products. Thus, GHG products, like other commodities, should be procured pursuant to the upfront standards established by the LTPP proceeding.

Third, recognizing this confluence, the Commission has already included the GHG Procurement Issues and GHG Compliance Issues as a part of the scope of Track III of the current

LTPP proceeding, R.10-05-006.⁵ In the LTPP proceeding, Administrative Law Judge (ALJ) Allen preliminarily determined that certain Rules Track III issues, including investor-owned utility (“IOU”) procurement of GHG-related products, will be addressed according to the System Track I schedule.⁶ SCE agrees that GHG Procurement Issues should be part of the current LTPP proceeding. To litigate GHG Procurement Issues in this OIR -- separately from all other IOU procurement issues -- would likely result in redundant efforts for various stakeholders in this OIR and could unnecessarily delay the Commission from reaching a decision on the critically important and time-sensitive Allowance Revenue Issues in this proceeding.

For all of these reasons, the LTPP proceeding is not only an appropriate proceeding to resolve the GHG Procurement Issues and GHG Compliance Issues, but the preferable one. Accordingly, the GHG Procurement Issues and GHG Compliance Issues should be removed from the scope of this proceeding altogether and should, instead, be addressed in the LTPP proceeding.

B. The Rulemaking Should Be Narrowly Focused On The Development Of Rules And Guidance To Distribute Revenues From The Sale of Allowances Back To Customers

Section 3.1 of the OIR provides that the Commission will use this proceeding to develop guidance on the use of revenues from the auctioning of GHG emissions allowances to be allocated to the utilities. According to the OIR, in addition to considering the use of revenues to provide customer bill relief, the Commission intends to consider the use of revenues for other

⁵ LTPP Scoping Memo, p. 44.

⁶ ALJ Allen Ruling Revising System Track I Schedule, filed May 6, 2010, at p. 4-5. The Ruling also states that “a subsequent ruling will identify and clarify the specific Rules Track III issues to be addressed concurrently with System Track I, and the process for the parties to address those issues.”

purposes, such as energy efficiency programs, programs that achieve AB 32 environmental justice goals, and research, development and demonstration of GHG emissions reducing technologies.⁷ It is SCE's position that the revenues from the auctioning of GHG emissions allowances should be used to provide customer bill relief in order to mitigate the increase in customers' electric bills due to GHG-related costs.⁸

Customer bill relief is the best use of allowance proceeds because it will garner public support for the GHG cap-and-trade program. The GHG cap-and-trade program is expected to dramatically increase customers' electricity costs in three ways. First, the utility will have to purchase and retire GHG allowances and offsets for any GHG emissions at utility-owned generating stations as well as those related to the utility's imported electricity where the utility is the first jurisdictional deliverer to the California electrical grid. Second, the utility will also face a financial obligation related to any power purchase agreements where the utility has agreed to accept the GHG compliance liability. Third, because the price of GHG emissions will now be reflected in wholesale power prices, the utility will face a sizeable increase in procurement costs of all electricity that it purchases from wholesale markets.⁹ If this collective cost increase is not mitigated by revenues from auctioning of GHG allowances, the corresponding customer rate and bill increase will be substantial and will likely lead to a customer backlash against the GHG cap-and-trade program.

Another reason to use GHG allowance revenues to reduce the overall rate that customers must pay is that it results in an outcome that puts the IOUs, community choice aggregators ("CCAs") and electric service providers ("ESPs") on par with municipal utilities. Municipal utilities, which are not restricted in their use of allowances, can (and likely will) use allowance

⁷ OIR, p. 19.

⁸ With respect to the use of allowances from LCFS credits, SCE would add that because these credits are not expected to have an immediate cost impact, this issue can be addressed after the GHG Procurement Issues, GHG Compliance Issues and Allowance Revenue Issues are resolved and possibly in a separate proceeding.

⁹ SCE purchases approximately two-thirds of all electricity that it provides to its bundled service customers, with the balance provided from generating stations it owns.

revenues to provide rate relief to their customers. In this event, only IOU, CCA and ESP customers will bear the costs of programs that everyone, including municipal utility customers, will benefit from. Accordingly, allowing the IOUs to pass allowance revenues along to their customers (including those receiving procurement services from CCAs and ESPs) is the only approach that ensures equal treatment among the various load-serving entities.

Additionally, SCE will advocate in this proceeding that the Commission provide customer bill relief by reducing a delivery rate component (e.g. distribution rate) that all customers (including ESP and CCA customers) pay. SCE's proposal will allow for the cost of GHG compliance to be included in customers' generation rate component so that bundled service customers can see the impact of the GHG compliance cost through higher generation rate levels. SCE's proposal would simultaneously achieve the goal of sharing the benefit of revenues from auctioning of GHG emissions allowances with all customers, including ESP and CCA customers.¹⁰

Therefore, SCE urges the Commission to limit the scope of this proceeding to focus on developing rules and guidance related to using the revenues from the auctioning of GHG emissions allowances for customer bill relief in order to mitigate the cost imposed by the GHG cap-and-trade program on California electricity customers.

¹⁰ See Sections 95892(d)(2) and 95892(d)(3) of Proposed Regulation to Implement the California Cap-and-Trade Program, California Environmental Protection Agency/Air Resources Board, October 28, 2010 ("CARB Proposed Regulations").

C. **If the GHG Procurement Issues and GHG Compliance Issues Are Considered In This Proceeding, The Commission Should Adopt An Accelerated Schedule With Respect To These Issues To Give The Utilities Sufficient Time To Prepare For The GHG Cap-and-Trade Program**

CARB has established a January 1, 2012 target date for the implementation of a GHG emissions cap-and-trade program and CARB plans to conduct its first auction of GHG allowances in February 2012. Even though there is currently a legal challenge to CARB's implementation of its scoping plan and the GHG cap-and-trade program, SCE is unaware of any basis for finding that there will be a delay in the implementation of the GHG cap-and-trade program resulting from this challenge. SCE is obligated to participate in the GHG cap-and-trade program pursuant to CARB regulations. SCE needs to obtain the Commission's authorization for GHG procurement transactions in a timely manner so that it has time to prepare its procurement strategy and consult with its Procurement Review Group before participating in the GHG allowances and offset markets. Accordingly, in the event the Commission rejects SCE's request to resolve the GHG Procurement Issues and GHG Compliance Issues through the LTPP proceeding, the schedule for resolving these issues will need to be significantly accelerated to provide for a final decision authorizing utility procurement of GHG compliance products by December 2011.

D. **Unless The Commission Adopts An Interim Decision That Adequately Resolves The Allowance Revenue Issues for 2012, The Commission Should Adopt An Accelerated Schedule To Resolve The Allowance Revenue Issues Prior To The Establishment Of 2012 Rates**

SCE will be filing its forecast costs for GHG compliance as part of its 2012 ERRA forecast proceeding on August 1, 2011. The Assigned Commissioner, ALJ and parties in SCE's 2012 ERRA forecast proceeding will be reviewing and evaluating SCE's proposed ratemaking

and cost recovery proposals for its 2012 GHG compliance costs and revenues beginning this summer, while this proceeding is just getting started. In the last quarter of this year, the Commission will be issuing and considering a proposed decisions in SCE's ERRA proceeding, and also considering and approving the utilities' electric rate changes, which will become effective January 1, 2012.

Given this schedule for SCE and the other utilities' rate changes for 2012, it is essential that the Commission issue a decision on the Allowance Revenues Issues, even if on an interim basis, in time for the Commission to incorporate that decision into SCE's ERRA-related rate changes effective January 1, 2012. Otherwise, there is an extremely high risk that the incremental costs of GHG compliance will be included in the utilities' 2012 rates, leading to a substantial rate increase, without the opportunity for the utilities to mitigate those costs beginning January 1, 2012 with the allowance revenues that are the subject of this proceeding. Furthermore, without resolution of the Allowance Revenue Issues, SCE will not know the extent to which its customers are exposed to rising GHG compliance costs and therefore will be unable to make proper hedging decisions.

Accordingly, if the Commission fails to adopt an interim decision with respect to the Allowance Revenue Issues, the Commission will have to adopt an accelerated schedule in this proceeding, whereby a final decision is issued by November 15, 2011, to ensure resolution of the Allowance Revenue Issues prior to the establishment of 2012 rates.

III.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Assigned Commissioner or assigned ALJ adjust the scope and schedule of this proceeding pursuant to this PCS, as permitted under the third ordering paragraph of the OIR.

Respectfully submitted,

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April 21, 2011

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **PREHEARING CONFERENCE STATEMENT OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **21st day of April, 2011**, at Rosemead, California.

/s/ Monica Romero
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