

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



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Order Instituting Rulemaking to Integrate
Procurement Policies and Consider Long-Term
Procurement Plans

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**PETITION OF
SAN DIEGO GAS & ELECTRIC COMPANY
(U 902-E) FOR MODIFICATION OF D.07-12-052**

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I.

INTRODUCTION

Pursuant to Rule 16.4 of the Commission’s Rules of Practice and Procedure, San Diego Gas & Electric Company (SDG&E) hereby files this Petition for Modification (Petition) of D.07-12-052, the Commission’s most recent Long-Term Procurement Plan (LTPP) decision. In this Petition, SDG&E requests that the Commission clarify two issues in D.07-12-052. First, SDG&E seeks clarification regarding its need authorization of 530 MW of new local capacity by 2015. Currently, this authorization is conditioned in D.07-12-052 on the “development” of the Sunrise Powerlink.^{1/} Second, SDG&E seeks a clarification to the Independent Evaluator (IE) requirement for short-term, standard

^{1/} D.07-12-052 states in pertinent part as follows: “Because there is insufficient information at this time to determine if or when the Sunrise Powerlink project will be available to meet local capacity needs, we authorize SDG&E to procure 530 MW of additional local capacity (which includes the 130 MW of local peakers already approved by the Commission for a residual of 400 MW remaining procurement authorization) if its application for the Sunrise Powerlink is denied. *If the Sunrise project is developed, only the 130 MW of local peakers are (retroactively) authorized*” (D.07-12-052, mimeo (PDF posted on CPUC Web site) pp. 114-15, emphasis added).

transactions involving resource adequacy (RA) capacity.^{2/} SDG&E has proposed specific wording changes to accomplish these modifications in Section IV below.

To briefly summarize this Petition, SDG&E's need authorization must be clarified because of the uncertainty created in D.07-12-052 by linking the authorized need to a future event, specifically, the "development" of the Sunrise Powerlink. The timing for this line now differs from the assumptions underlying SDG&E's filed LTPP upon which the conclusions in D.07-12-052 were based. As such, the decision does not presently address the time interval between the approval of the Sunrise Powerlink and an in-service date for the line that occurs after the 2010 date assumed in the LTPP. SDG&E therefore requests that the decision be modified to allow SDG&E to contract for and complete projects that were begun prior to any future downward adjustment to authorized need linked to Sunrise being "developed."

The clarification of the IE requirement is necessary to address a straightforward, short-term transaction situation for solicitations involving RA capacity where it is impractical and unnecessary to use an IE, even where an affiliate may be among the bidders. The current language in the decision does not necessarily exclude the IE requirement in that context, although SDG&E doubts the Commission intended to apply the IE requirement to such short-term RA capacity solicitations.

II.

ONE ASPECT OF SDG&E'S NEED SHOWING SHOULD BE CLARIFIED

D.07-12-052 authorized SDG&E to procure resources to meet its needs as follows:

^{2/} This requested IE modification is separate from modifications that have been discussed in workshops regarding the use of IEs for transactions of less than two years.

- SDG&E is authorized to procure 530 MW of new local capacity by 2015. The 530 MW includes the 130 MW of peakers already approved by the Commission, leaving a residual new local capacity need of 400 MW by 2015 (p. 115).
- If the Sunrise Powerlink is approved and developed, then only the 130 MW of local peakers are authorized (p. 115).
- If a previously authorized resource is determined unviable during the development process and the associated contract is terminated, the procurement authority for those megawatts remains (p. 115).
- SDG&E is authorized to procure the equivalent quantity of local capacity associated with any retirements of local area resources that occur beyond the amount of retirements forecasted in the LTPP (p. 115).
- SDG&E is authorized to procure existing resources (in addition to the authorized new generation) as needed to meet its bundled customers' system and local resource adequacy need (p. 103).

These need determinations are reflected in SDG&E's LTPP compliance filing, Advice Letter 1983-E (Sheets 136-140), which was filed on April 18, 2008. SDG&E requests that D.07-12-052 be clarified around the first two bullets above addressing the local capacity authorization to add new local resources by 2015 (400 MW after the reduction by the 130 MW of local peakers already authorized in D.07-09-010). Along these lines, D.07-12-052 states that "[i]f the Sunrise Powerlink is developed," then only the 130 MW of local peakers are authorized.^{3/} An ambiguity arises over the term "developed," however, because there is a gap in time between the date that the Sunrise Powerlink is approved and the date by which it will become operational ("developed"). New local capacity may still be needed after the project is approved, beyond the 130 MW already authorized, to ensure that sufficient resources are available to meet local reliability needs before the Sunrise Powerlink is operational. It is only with the addition of the

^{3/} D.07-12-052, p. 115.

Sunrise Powerlink that the local capacity requirement authorized in D.07-12-052 is displaced, with certainty, by the new transmission line.

The need for new local capacity in SDG&E's service area without Sunrise is shown in Table III-3 on Sheet 138 of SDG&E's LTPP April 2008 compliance filing in this proceeding.^{4/} This Table shows that there will be a need for between 86 and 322 MW of new capacity in 2010. Given the current schedule for a decision in the Sunrise Powerlink proceeding, however, the line will not be operational in 2010, as the LTPP assumed. In addition, the amount of new local capacity increases to a total need of between 160 and 400 MW in 2011.

Unfortunately, one interpretation of the current LTPP authorization is that SDG&E can only procure 130 MW of this need and not beyond that amount between the date that the Sunrise Powerlink is approved and the date that it becomes operational. Thus, SDG&E's service area could be short up to 192 MW in 2010 and 270 MW in 2011 after procuring the authorized 130 MW. Also, given the Commission's proposed schedule for the next LTPP filing, no new authorizations would be granted in time to address this shortfall. It is therefore critical that SDG&E be allowed to contract for and complete projects that were begun prior to any future downward adjustment to authorized need linked to Sunrise being developed.

To ensure that D.07-12-052 correctly states SDG&E's new local capacity need authorization, SDG&E recommends that the Commission authorize the modifications to D.07-12-052 set forth in Section IV below. The long-term contracts that SDG&E signs to meet this need will be brought to the Commission for specific approval, which provides the

^{4/} SDG&E has attached to this PFM Table III-3 from the April 18, 2008 LTPP compliance plan filing.

Commission with an additional check point that only necessary new capacity is being added. Without granting SDG&E certainty that projects started prior to the approval of Sunrise can be completed, however, potential bidders would lack assurances that if their project is selected and approved that it should be completed.

III.

THE IE REQUIREMENT IN D.07-12-052 SHOULD BE CLARIFIED TO CONFIRM THAT AN IE IS NOT REQUIRED FOR SHORT-TERM SOLICITATIONS FOR RA CAPACITY

Among other requirements in D.07-12-052, the Commission ordered that IEs continue to be utilized for all long-term solicitations that involve utility affiliates or utility-owned or utility-turnkey bids.^{5/} Given that utilities may not know with certainty whether the utility or its affiliate will bid on a particular solicitation, the Commission also required that an IE be utilized for all competitive RFOs that seek products of more than three months in duration.^{6/} The Commission, however, did not specifically discuss short-term RA capacity solicitations, where IOUs may seek to buy or sell RA capacity and an affiliate may be among the bidders.

Unlike transactions involving highly structured, non-standard products (e.g., complex tolling agreements or long-term contracts for new capacity), where significant evaluation of bids and negotiation of final terms may be required, short-term RA capacity solicitations involve standard local or system RA products where only a very limited set of factors is involved (local or system RA, amount, location and price). Additionally, even though such transactions can range from one month up to one year in duration, much like other short-term sales, the RFP evaluation and negotiation processes are completed over a

^{5/} D.07-12-052, p. 140.

^{6/} Id.

short time-frame, making use of an IE difficult. Indeed, these transactions involve minimal negotiation and typically include a simple review of price, location and amount to determine the highest/best fit bidder. In addition, a summary of any transactions resulting from these solicitations is provided to the Commission in SDG&E's Quarterly Procurement Transactions Reports. Also, if an affiliate is selected in one of these short-term RA solicitations, the deal would be subject to affiliate transactions reporting to the Commission.

For these reasons, SDG&E believes that the Commission should not include (and probably did not intend to include) these types of short-term RA solicitations in its mandate that IEs should be used for all competitive RFOs that seek products of more than three months in duration, even where an affiliate may have bid on the RA RFP. To resolve this problem, SDG&E requests that the Commission clarify D.07-12-052 by confirming that short-term (from one month up to a year) RA capacity transactions, even where affiliates submit bids, do not require use of an IE.

IV.

SPECIFIC WORDING CHANGES TO D.07-12-052

P. 114. Backing these 130 MW of local resources out of SDG&E's need determination results in a remaining procurement need of 400 MW of local resources by 2015 if the Sunrise Powerlink project is not developed (the El Dorado facility is not a local resource and is therefore not backed out of this local capacity-driven need).

PP. 114-115. Because there is insufficient information at this time to determine if or when the Sunrise Powerlink project will be available to meet local capacity needs, we authorize SDG&E to procure up to 530 MW of additional local capacity (which includes

the 130 MW of local peakers already approved by the Commission for a residual of 400 MW remaining procurement authorization) by 2015 if its application for the Sunrise Powerlink is denied. Additionally, even if the Sunrise project is developed-approved, SDG&E is also authorized to complete procurement of the new generation needed to meet grid reliability as identified in its LTPP compliance filing “Service Area Need Without Sunrise” Table prior to the Sunrise Powerlink being on-line and operational. ~~only the 130 MW of local peakers are (retroactively) authorized.~~

Finding of Fact 49. Because there is insufficient information at this time to determine if or when the Sunrise Powerlink project will be available to meet local capacity needs, we authorize up to 530 MW by 2015 of additional procurement for SDG&E in the San Diego local area only if its Sunrise Powerlink application is denied. Additionally, if the Sunrise Powerlink is approved, SDG&E is also authorized to complete procurement of the new generation needed to meet grid reliability as identified in its LTPP compliance filing “Service Area Need Without Sunrise” Table prior to the Sunrise Powerlink being on-line and operational.

New Finding of Fact. Short-term (from one month up to one year) transactions to buy or sell RA capacity do not require the use of an IE even where affiliates are among the bidders because it is unnecessary and infeasible to use an IE in this context.

Conclusion of Law 7. Based on our analysis of the CEC’s IEPR load forecast, as updated, and the preferred/recommended plans of the IOUs, we make the following need determinations:

- PG&E has a range of need of 800 – 1,200 MW of new resources by 2015;

- SCE has a range of need of 1,200 – 1,700 MW of new resources by 2015, in addition to the 305 MW remaining from SCE’s standard-track RFO; and
- SDG&E has a need of 530 MW by 2015 of new resources in its local area (including the 130 MW already approved by this Commission) if its Sunrise Powerlink application is denied. Additionally, if the Sunrise Powerlink is approved, SDG&E is also authorized to complete procurement of the new generation needed to meet grid reliability as identified in its LTPP compliance filing “Service Area Need Without Sunrise” Table prior to the Sunrise Powerlink being on-line and operational.

New Conclusion of Law. Use of an IE for short-term (one month up to one year) RA capacity solicitations is not required, even if an affiliate is among the bidders, because there are few negotiated terms involved and the process moves too quickly to require use of an IE in these situations.

Ordering Paragraph 6. SDG&E is authorized to procure 530 MW of new resources (including fossil fuel resources) by 2015 in its local area if its application for the Sunrise Powerlink is denied. This authorization includes the 130 MW of local peakers already approved by the Commission. Additionally, if the Sunrise Powerlink is approved, SDG&E is also authorized to complete procurement of the new generation needed to meet grid reliability as identified in its LTPP compliance filing “Service Area Need Without Sunrise” Table prior to the Sunrise Powerlink being on-line and operational. SDG&E is also authorized to procure the equivalent quantity of local capacity associated with any retirements of local area resources that occur beyond the amount of retirements it forecasts in its LTPP.

New Ordering Paragraph. The utilities are not required to use an IE for short-term (one month to one year) transactions to buy or sell RA capacity, even if affiliates are among the bidders, because these situations move quickly, they involve few negotiated terms, and the results are filed in the utilities’ Quarterly Procurement Transactions Reports.



2006 LONG TERM PROCUREMENT PLAN

Table III-2

Service Area Need with the Sunrise Powerlink									
	2008	2009	2010	2011	2012	2013	2014	2015	2016
High	(93)	458	(322)	600	522	447	372	296	223
Low	(93)	690	(86)	840	765	694	622	550	480

The table without the Sunrise Powerlink shows the same needs as above through 2009. Starting in 2010, without the Sunrise Powerlink, additional generation is needed in all years. No existing generation would be able to retire until sufficient new generation is built to meet the identified shortage and replace the retiring generation.

Table III-3

Service Area Need without the Sunrise Powerlink									
	2008	2009	2010	2011	2012	2013	2014	2015	2016
High	(93)	458	(322)	(400)	(478)	(553)	(628)	(704)	(777)
Low	(93)	690	(86)	(160)	(235)	(306)	(378)	(450)	(520)

Because there was insufficient information, at the time of the decision, regarding if or when the Sunrise Powerlink project will be available to meet local capacity needs, the Decision authorized SDG&E to procure 530 MW of additional local capacity (which includes the 130 MW of local peakers already approved by the Commission, for a residual of 400 MW remaining procurement authorization), if its application for the Sunrise Powerlink is denied. If the Sunrise project is developed, only the 130 MW of local peakers are (retroactively) authorized. D.07-12-052 also noted that if a previously authorized resource is determined unviable during the development process and the associated contract is terminated, the procurement authority for those megawatts remains.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **PETITION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR MODIFICATION OF D.07-12-052** on all parties of record in R.06-02-013 by electronic mail and by U.S. mail to those parties who have not provided an electronic address to the Commission. I have also sent a hard copy by overnight mail to the Assigned Administrative Law Judge, Assigned Commissioner, Matthew Deal, and Peter Skala.

Dated at Los Angeles, California, this 9th day of June, 2008.

/s/ Becky Roberts

Becky Roberts

#218566

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists - Proceeding: R.06-02-013 - Last changed: June 3, 2008

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