



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

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Order Instituting Rulemaking to Address  
Utility Cost and Revenue Issues  
Associated with Greenhouse Gas  
Emissions.

R.11-03-012

**REPLY OF THE ENERGY PRODUCERS AND USERS COALITION  
TO PREHEARING CONFERENCE STATEMENTS**

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May 5, 2011

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R.11-03-012  
(Filed March 24, 2011)

**REPLY OF THE ENERGY PRODUCERS AND USERS COALITION  
TO PREHEARING CONFERENCE STATEMENTS**

The Energy Producers and Users Coalition (EPUC)<sup>1</sup> submit this reply to pre-hearing conference statements submitted on April 21, 2011, pursuant to the Order Instituting Rulemaking.

**I. INTRODUCTION AND SUMMARY**

The prehearing conference (PHC) statements filed on April 21, 2011 reveal parties' preliminary substantive and procedural positions in the proceeding. The PHC statements also raise important issues that should be considered in this proceeding. Based on the statements filed, EPUC recommends as follows:

- The Commission should provide detailed guidance on the mechanism(s) to be used to directly mitigate GHG compliance costs experienced by utility customers;

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<sup>1</sup> EPUC is an ad hoc group representing the electric end use and customer generation interests of the following companies: Aera Energy LLC, BP West Coast Products LL, Chevron U.S.A. Inc., ConocoPhillips Company, ExxonMobil Power and Gas Services Inc., Shell Oil Products US, THUMS Long Beach Company, and Occidental Elk Hills, Inc.

- The Commission must ensure timely guidance on the evaluation of GHG component of bids and GHG cost recovery by CHP facilities; and
- The Commission should ensure that auction revenues do not advantage utility-owned generation.

In addition, EPUC agrees with other parties to the proceeding that direct mitigation of customer's increasing costs is the best use of utility auction revenues. These issues are discussed below.

**II. THE COMMISSION MUST PROVIDE DETAILED GUIDANCE ON THE MECHANISMS TO BE USED TO DIRECTLY MITIGATE GHG COMPLIANCE COSTS EXPERIENCED BY UTILITY CUSTOMERS.**

This rulemaking should resolve the manner in which the indirect GHG compliance costs imposed on utility customers are mitigated through the use of the utility allowance or revenue allocation under CARB's cap-and-trade (C/T) program. To accommodate a potential January 1, 2012 start date, the resolution must specify the detailed mechanics of this mitigation, not simply provide conceptual principles. For energy-intensive, trade-exposed (EITE) utility customers that will be regulated under the C/T program, it will be critical to determine the application of utility allowances or revenues prior to the outset of the program.

TURN observes that while parties may agree that auction revenues should be used to benefit ratepayers, parties are likely to differ on how auction revenues should apply to customers.<sup>2</sup> EPUC agrees. The proceeding begins, however, with a few key principles that will guide the Commission's determination.

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<sup>2</sup> TURN PHC Statement, at 2-3.

First, CARB has indicated a preference for a mechanism that will not dampen the price signal attributed to the C/T program.<sup>3</sup> Its draft regulations also clarify that any mechanism chosen to directly mitigate GHG compliance costs cannot be based on usage data after January 1, 2012.<sup>4</sup> Based on CARB's guidance, therefore, the CPUC can select bill relief, rebates, or allowance allocation to directly mitigate GHG compliance costs based on usage data from a historic period.

Second, Resolution 10-42 clarifies that utility "allowance value" must be used for the benefit of its ratepayers "*that might otherwise face indirect costs from implementation of [C/T] regulation...*" EITE customers will face some of the largest indirect cost impacts of the C/T program. Consequently, in evaluating the allocation of allowance value, the Commission must evaluate the extent to which ratepayers bear an indirect C/T cost.

Third, CARB is in the process of developing a mechanism to allocate allowance value to EITE facilities. Many of these facilities are utility customers. Consequently, the Commission's use of allowances or revenues on behalf of these customers must support and be consistent with CARB's EITE allowance allocation regulations and guidance.

These three principles provide a solid foundation from which the Commission can make its determination in this proceeding.

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<sup>3</sup> Appendix J of CARB Initial Statement of Reasons, at J-67.

<sup>4</sup> CARB Draft Regulations § 95892(d).

**III. THE COMMISSION MUST ENSURE TIMELY GUIDANCE ON ASSESSING GHG BID OPTIONS AND GHG COST RECOVERY BY CHP FACILITIES.**

*The Qualifying Facility and Combined Heat and Power Program*

*Settlement Agreement* (Settlement) adopted in D.10-12-035 contemplates a series of CHP-only competitive solicitations. Assuming that all conditions to implementation are met in the next month or two, the parties anticipate that the first CHP competitive solicitation could take place in the fourth quarter of 2011. It is important that the Commission provide guidance to the utilities in assessing the GHG component of these competitive bids in advance of the solicitation. It is also important that the Commission ensure that CHP facilities recover carbon costs associated with power exported to the utilities, as CARB intended, even if the Settlement does not take effect by January 1, 2012.

The Commission should not permit the procedural schedule in this proceeding to delay consideration of these important issues. The utilities recommend moving GHG procurement issues into Track I of the long term procurement plan (LTPP) proceeding. They argue that the LTPP is a better fit for procurement issues because the Commission addresses other similar, risk-management issues in that proceeding.<sup>5</sup> SCE also suggests that unburdening this proceeding with procurement issues could expedite the Commission's determination on the use of allowance revenues.<sup>6</sup> DRA, on the other hand, argues that it is appropriate to keep all GHG issues within this proceeding as a

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<sup>5</sup> PG&E Prehearing Conference (PHC) Statement, 2-3; SCE PHC Statement, at 3-6; SDG&E/SoCalGas, at 2-4.

<sup>6</sup> See generally SCE PHC Statement, at 9-10.

*“consistent approach should be used to evaluate GHG compliance risk.”*<sup>7</sup> While EPUC favors retention of procurement issues in this proceeding, its primary concern is ensuring that determinations are made in a timely manner. Whether in this docket or the LTPP, the Commission must provide the utilities guidance regarding the assessment of GHG bid options in advance of the first CHP solicitation.<sup>8</sup> In addition, the Commission must develop a mechanism, either in this proceeding or in the LTPP, to ensure that CHP facilities exporting power are compensated for GHG compliance costs if the Settlement does not take effect by January 1, 2012. As noted in EPUC’s PHC statement, Attachment B of CARB Resolution 10-42 earmarks 8.7 MMT of electricity sector allowances to cover emissions associated with CHP exports because it assumes that CHP facilities will pass through these expenses.<sup>9</sup> If the Settlement does not take effect by January 1, 2012, most existing CHP contracts will not allow for pass-through of these expenses.<sup>10</sup>

#### **IV. THE COMMISSION MUST ENSURE THAT USE OF UTILITY AUCTION REVENUES DOES NOT PROVIDE A COMPETITIVE ADVANTAGE TO UTILITY-OWNED GENERATION**

The Independent Energy Producers Association (IEPA) notes that utility allowance value should not be used to subsidize utility-owned renewable generation.<sup>11</sup> The same principle should apply to non-renewable generation.

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<sup>7</sup> See DRA Prehearing Conference (PHC), at 4.

<sup>8</sup> PG&E Prehearing Conference (PHC) Statement, 2-3; SCE PHC Statement, at 3-6; SDG&E/SoCalGas, at 2-4.

<sup>9</sup> EPUC PHC Statement, at 7-8

<sup>10</sup> *Id.*

<sup>11</sup> IEPA PHC Statement, at 2.

The Commission should ensure that utility auction revenues are not used to fund or generate benefits for utility-owned generation and utility shareholders.

## V. PARTIES AGREE THAT DIRECT MITIGATION OF GHG COMPLIANCE COSTS IS THE BEST USE OF UTILITY AUCTION REVENUES

In determining how utility auction revenues should be used, most parties support a heavy, if not exclusive reliance on direct mitigation of GHG compliance costs. Parties recommend this use for a variety of reasons:

- Mitigate the Trade Exposure of EITEs: EPUC and CLECA, representing EITEs recommend direct mitigation of GHG compliance costs for EITE ratepayers to further CARB’s objective of mitigating trade exposure.<sup>12</sup>
- Preclude Anti-Competitive Impacts on Non-Utility Retail Providers: Shell Energy North America, L.P. (Shell Energy), Marin Energy Authority (MEA), and Women Energy Matters (WEM) represent energy service providers (ESPs) and community choice aggregators (CCAs). These parties and SCE note that auction revenues should not be used to provide the utilities a competitive advantage over ESPs and CCAs.<sup>13</sup> Shell Energy, in particular, notes that the allocation of auction revenues to utility programs and projects would benefit shareholders at the expense of utility and non-utility ratepayers.<sup>14</sup> Accordingly, it recommends that the Commission develop a mechanism to directly allocate auction revenues back to ratepayers based on usage.<sup>15</sup>
- Avoid Anti-Competitive Impact on Independently Owned Generation: The Independent Energy Producers Association (IEPA) notes that utility auction revenue use should not “*tilt the competitive playing field*” between utility-owned generation and independent power projects. More specifically, IEP states that because utilities will be the recipients of auction revenues, the Commission should ensure that utility revenues are not used to subsidize utility-owned projects.

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<sup>12</sup> See EPUC PHC Statement, at 3-5; CLECA PHC Statement, at 4-7.

<sup>13</sup> See Shell Energy PHC Statement, at 2, 4-5; MEA PHC Statement, at 3; Women Energy Matters PHC Statement, at 4-5 (opposing the use of utility auction revenues for energy efficiency as it can generate shareholder benefits and given controversy over benefits generated); SCE PHC Statement, at 7.

<sup>14</sup> Shell Energy PHC Statement, at 4.

<sup>15</sup> Shell Energy PHC Statement, at 5.

While parties expressed different concerns, their comments reveal that use of utility auction revenues for direct mitigation of customers' increasing costs could easily avoid several adverse impacts that could otherwise result.

## **VI. CONCLUSION**

For all of the foregoing reasons, EPUC requests that the Commission give consideration to the issues identified above.

Respectfully submitted,

A handwritten signature in cursive script that reads "Evelyn Kahl".

Evelyn Kahl  
Seema Srinivasan

Counsel to the Energy Producers and  
Users Coalition

May 5, 2011

## CERTIFICATE OF SERVICE

I, Karen Terranova hereby certify that I have on this date caused the attached **Reply of the Energy Producers & Users Coalition to the Prehearing Conference Statement** in R.11-03-012 to be served to all known parties by either United States mail or electronic mail, to each party named in the official attached service list obtained from the Commission's website, attached hereto, and pursuant to the Commission's Rules of Practice and Procedure.

Dated May 5, 2011 at San Francisco, California.

A handwritten signature in black ink that reads "Karen Terranova". The signature is written in a cursive style with a long horizontal flourish at the end.

Karen Terranova

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