BEFORE THE CALIFORNIA ENERGY COMMISSION



In the matter of IEPR Lead)
Commissioner Workshop)
Evaluating and Capturing Benefits)
of Renewable Energy for California)

) Docket No. 12-IEP-1D

CALIFORNIA ENERGY COMMISSION FIRST FLOOR, HEARING ROOM A 1516 NINTH STREET SACRAMENTO, CALIFORNIA

THURSDAY, APRIL 12, 2012 9:00 A.M.

Reported by: Kent Odell

APPEARANCES

Commissioners Present:

Robert Weisenmiller, Chair Carla Peterman, Lead Commissioner

Staff Present:

Suzanne Korosec, IEPR Lead Kate Moore, Energy Commission Staff

Panel 1:

Al Alvarado, Energy Commission Staff, Moderator Arne Olson, E3 Consulting James Nelson, UC Berkeley Warren Leon, Clean Energy States Alliance Heather Sanders, California Independent System Operator Shana Lazerow, Communities for a Better Environment Ben Machol, US Environmental Protection Agency Margaret Mann, National Renewable Energy Laboratory

Panel 2:

Gary O'Neill, Energy Commission Staff, Moderator Steve Cliff, California Air Resources Board Bill Snyder, CAL FIRE Tim Snellings, Butte County Dept. of Development Services Steve Weissman, UC Berkeley Center for Law, Energy & Environment Heather Sanders, California Independent System Operator Jim Houston, California Department of Food and Agriculture

Panel 3:

Kate Zocchetti, Energy Commission Staff, Moderator Aaron Johnson, Pacific Gas & Electric JC Thomas, San Diego Gas & Electric Tamara Rasberry, Sempra Energy Utilities Marc Ulrich, Southern California Edison Andrew McAllister, California Center for Sustainable Energy Nicole Capretz, California Environmental Justice Alliance Steven Kelly, Independent Energy Producers Association Craig Lewis, Clean Coalition Lori Schell, UC Irvine/Empowered Energy Laura Wisland, Union of Concerned Scientists *Randy Howard Public Comment:

John Larrea V. John White

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MS. KOROSEC: All right, good morning, I think we'll go ahead and get started. I'm Suzanne Korosec, I manage the Energy Commission's Integrated Energy Policy Report Unit. Welcome to today's workshop on Evaluating and Capturing Benefits of Renewable Energy for California.

9 Just a few quick housekeeping items before we 10 begin, restrooms are in the atrium, out the double doors 11 and to your left. We have a snack room on the second 12 floor, at the top of the atrium stairs, under the white 13 awning. But you'll notice there's construction on the 14 central stairway so please take the elevator to the 15 second floor, if you want to go to the snack room.

And if there's an emergency and we need to evacuate the building, please follow the staff out the door to the park, that's diagonal to the building, and wait there for the all-clear signal, and bring your umbrellas because it's raining.

Today's workshop is being broadcast through our WebEx conferencing system and parties do need to be aware that it is being recorded.

24 We'll make an audio recording available on our 25 website a couple days after the workshop and we'll also CALIFORNIA REPORTING, LLC

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1 provide a written transcript in about two weeks.

2 We plan to break for lunch a little later than 3 usual today, around 12:30.

And in addition to our panel discussions today, we've set aside time at the end of the day for public comments. During the public comment period we'll take comments, first, from those of you here in the room and then followed by those participating via WebEx.

9 When you're making comments today we ask that 10 you come up to the center podium and use the microphone, 11 so that we can make sure that the WebEx participants can 12 hear you.

And it's also helpful if you can give your transcriber, at the end of the table, your business card so that we can make sure that your name and affiliation are reflected correctly in the transcript.

For WebEx participants, you can use either the chat or raise hand functions to let our coordinator know that you would like to ask a question or make a comment, and we'll either relay your question or open your line at the appropriate time.

22 We're also accepting written comments on today's 23 topics until close of business April 19th. And the 24 notice for today's workshop, which is available on the 25 table in the foyer and also on our website, explains the 26 CALIFORNIA REPORTING, LLC

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1 process for submitting comments to the IEPR docket.

2 What I'd like to do now is provide a little 3 context for today's workshop. Every two years the 4 Energy Commission prepares an Integrated Energy Policy 5 report that covers a variety of energy topics and 6 provides policy recommendations to the Governor.

In 2010, as part of his Clean Energy Jobs Plan,
Governor Brown directed the Energy Commission to prepare
a plan to expedite permitting of the highest priority
renewable generation and transmission projects.

In response to that direction much of the focus of the 2011 IEPR proceeding was on identifying challenges to renewable development and the many activities that are already completed or underway to address those challenges.

16 The result was the Renewable Power In California 17 Status and Issues report, which was issued in late 2011, 18 which discussed the various challenges and laid out five 19 high-level strategies to be used as the basis for a 20 renewable strategic plan to be developed during the 2012 21 IEPR update proceeding.

At this point I'd like to introduce Heather Rait, the Project Manager for the Renewable Strategic Plan. You want to wave your hand, Heather?

25 Heather's the Assistant Executive Director for CALIFORNIA REPORTING, LLC

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Renewables and Climate Change here, at the Commission,
 and is working closely with our technical staff on the
 issues associated with each of the five high-level
 strategies.

5 Today's workshop is the first of seven workshops 6 that we're holding over the next several months, related 7 to those strategies, the dates of which are shown here.

8 And the discussions and input from the workshops 9 will be used to develop specific near-term actions that 10 the State needs to take to begin addressing the 11 challenges identified in the Renewable Power in 12 California report.

As I said, that report focused on identifying challenges and efforts to address those challenges and, therefore, it didn't include any analysis of renewable benefits.

17 The report did, however, acknowledge the general 18 benefits of renewables that often touted. For example, 19 benefits identified in the RPS legislation, things like 20 promoting stable electricity prices, protecting public 21 health by improving air quality, improving environmental 22 quality by reducing the burning of fossil fuels, 23 stimulating economic development, creating new 24 employment opportunities, and reducing reliance on 25 imported fuels.

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The report also included a qualitative
 discussion of the benefits of renewables in the context
 of concerns about the RPS driving up electricity prices.

4 The cost chapter of the report noted that 5 "Diversifying the State's portfolio with renewable 6 energy could ultimately reduce the overall cost of 7 energy to the consumer," referencing work that was done 8 by Shimon Awerbuch on portfolio-based capacity planning, 9 showing the beneficial contribution of renewables 10 towards meeting overall generating cost and increasing 11 energy security.

12 The report also mentioned the economic benefits 13 of renewables from increased property and sales taxes 14 associated with renewable generating facilities, and discussed the need for renewable prices to reflect the 15 16 volatility or unpredictability of future fossil fuel 17 prices since an energy portfolio that's heavily weighted 18 towards fossil fuels is extremely vulnerable to 19 movements in fossil fuel prices.

As an illustration, the report notes that there are estimates by Oakridge National Laboratory that volatility costs the U.S. economy \$7 trillion in

23 employment and GDP growth from 1970 to 2000.

24 The report also referenced two studies that

25 looked at valuing the environmental benefits of

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renewables. One was the German Federal Ministry for the
 Environment estimates that the combined costs of climate
 change in air pollution resulting from natural gas-fired
 generation are more than three times higher than solar
 PV and 13 times higher than wind energy.

6 They also estimated that societal costs of 7 natural gas were near five cents per kilowatt hour and 8 coal at more than eight cents per kilowatt hour, while 9 the societal costs for wind are around a quarter cent 10 per kilowatt hour, solar PV is one cent per kilowatt 11 hour, and biomass is between two-fifths of a cent to 12 five cents per kilowatt hour, depending on the 13 technology.

14 The second study discussed in the report was 15 conducted by the Oregon Forest Resources Institute and 16 suggests that using forest biomass for energy provides environmental benefits well in excess of the market 17 18 value of the electricity produced, with the energy value 19 estimated around 11 cents per kilowatt hour, while the 20 value of the avoided forest overgrowth represented an 21 additional 20 cents per kilowatt hour.

Obviously, these are only two of the many studies that have looked at valuing the renewable benefits, a list of which was included in today's -with today's workshop agenda.

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1 And these were used as illustrative purposes 2 since, as I said earlier, the Renewable Status and 3 Issues Report did not include a detailed analysis of 4 benefits.

5 Many of the stakeholder comments throughout the 6 2011 IEPR proceeding also referenced benefits of 7 renewables. With the emphasis on the Governor's goal of 8 adding 12,000 megawatts of renewable distributed 9 generation by 2020, many of the workshop comments 10 focused on DG benefits. 11 Benefits identified by parties included economic 12 benefits from reducing congestion on existing lines, 13 avoiding transmission and distribution line losses, 14 reducing the need for new transmission lines. 15 For example, it was pointed out that according

16 to the CSI 2009 Impacts Report, current installed 17 capacity under the CSI is providing transmission

18 capacity benefits comparable to a 230-kilovolt

19 transmission line.

20 Other benefits of DG identified in IEPR 21 workshops included providing an environmentally sound 22 alternative to large-scale renewables that may have 23 negative environmental impacts, increasing system 24 reliability by reducing unserved energy, which reduces 25 utility costs, and increasing power quality, which 26 CALIFORNIA REPORTING, LLC

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1 reduces customer impacts from voltage variability.

2 Parties also mentioned that DG is less likely to 3 be sited on virgin land and can be sited on brown field 4 properties in urban and suburban environments that would 5 otherwise be undeveloped and, therefore, provides land 6 use benefits.

Several parties focused, also, on benefits to
local communities, including increased private
investment and bringing additional money into those
communities, as well as improved air quality and
increased asthma rates particularly in low-income
communities that are often disproportionately affected
by fossil fuel generation.

Environmental justice advocates also noted that DG development in these communities provides jobs and gives consumers a sense of control over their energy sources.

18 And others identified the benefit of enabling 19 consumers to take an active role in managing their own 20 energy costs.

The overarching strategy that we're talking about today involves evaluating the cost of renewable energy projects beyond technology costs, coupled with the value assessment about system and non-energy benefits.

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1 Today's workshop is focused on the benefits side 2 of that equation, including health, environmental, and 3 economic benefits, but we fully recognize the importance 4 of looking at costs and retail rate impacts, as well. 5 And we'll be holding a workshop on that, on May 22nd.

6 We also recognize that there are significant job 7 benefits associated with renewable development and we'll 8 cover that topic at the May 30th workshop.

9 One last comment before I move on, while the 10 strategy we're discussing today refers to potentially 11 monetizing the system and non-energy benefits, our focus 12 today is on assessing these benefits and capturing them 13 for California, rather than on quantification.

So with that, I'll turn it over to the dais for opening remarks.

16 COMMISSIONER PETERMAN: Good morning, everyone, 17 thank you for being here. Glad to see so many of you in 18 the room on this rainy day, and hello to all of those on 19 WebEx.

First, Suzanne, this is Commissioner Carla
Peterman, I'm lead on the 2012 IEPR and very excited to
have you all here for our first workshop of the series.
Thank you very much to Suzanne Korosec for that

24 excellent introduction. I think she summarized well why

25 we're here and how this ties to the efforts the

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1 Commission has been engaged in over the last year.

2 Many of you were involved in submitting comments 3 in workshops for our 2011 IEPR. And this is the 4 exciting part, we've talked about the challenges, we've 5 talked about the data, and now we're going to come up 6 with some solutions.

7 The intent of these next seven workshops is to 8 really come up with some actionable items to help us 9 reach some of the State's goals for 2020 for renewables 10 and beyond.

11 One thing that's very nice, though, being a 12 Commissioner is that you get to call a lot of smart 13 people together in a room and they show up, ready to 14 talk. You know, I wish I could do the same thing in my 15 dissertation but I've been told that's not allowed.

But it's good to see you all here and so, with that, I'll turn to our Chairman for additional opening remarks.

19 CHAIRPERSON WEISENMILLER: Yeah, certainly, we'd
20 like to thank everyone for being here today and for
21 sharing their thinking.

22 Obviously, we're looking at renewable energy to 23 really transforming our electric system, particularly 24 the DG, and that means a lot of our conventional tools 25 and ways of thinking about things need to be similarly 26 CALIFORNIA REPORTING, LLC

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1 transformed.

And, obviously, to this part where we're trying to understand the benefits and also how to include those in our evaluation.

5 So, certainly look forward to an interesting day 6 on this and want to thank Commissioner Peterman and the 7 staff for helping to flesh this out.

8 MS. KOROSEC: All right, we'll start with Katie 9 Moore, of the Energy Commission staff, who will give us 10 an overview of today's goals of the workshop

11 MS. MOORE: Hi, I'm Katie Moore and I work here, 12 in the Renewable Energy Office. I'm just going to 13 provide a brief presentation, a little more background 14 information and some information on how the workshop 15 will work today.

16 The purpose of this workshop is to seek input 17 from stakeholders on evaluating and capturing the 18 benefits of renewable energy for California. And today 19 we're going to focus on health and environmental 20 benefits. We'll also include some economic benefits 21 but, as Suzanne said, we'll discuss employment benefits 22 at a later workshop.

Today we'll discuss recent assessments of public
 benefits from different types of renewable energy,
 whether those benefits are sufficiently considered in
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renewable energy procurement and other related programs,
 and some new ideas to better capture benefits of
 renewable energy for California.

The input that we gather at this workshop will be used, along with other information from the 2012 IEPR proceeding, to develop strategies for quantifying and capturing public benefits in the energy procurement -renewable energy procurement and other programs.

9 And this is our agenda for the day; in just a 10 few minutes, when I'm done, we'll begin with Panel One, 11 at 9:30, on assessing the public benefits of renewable 12 energy generation.

And after that panel we'll have Panel Number Two on State and local policies and programs to capture the public benefits of renewable energy.

At 12:30 we'll break for an hour lunch. At 1:30 we'll resume with Panel Number Three on stakeholder experience and new ideas to better capture the benefits of renewable energy.

20And from 4:30 to 5:00 we'll have public21comments.

The panel discussions will begin with brief opening statements from each panelists and then the panelists will discuss the questions that are on the workshop agenda.

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There will probably be additional questions from
 the panel moderators and the Commissioners.

3 I'm going to just provide a brief overview on
4 the topics that will be discussed in each panel. For
5 the first panel, on assessing public benefits of
6 renewable energy, we will discuss the various public
7 benefits that renewable energy generation can provide,
8 factors that affect those benefits and methods and tools
9 to assess and quantify those benefits.

10 We'll also discuss how to reduce the uncertainty 11 of the benefits and maximize the value of renewable 12 resources.

13 Our second panel, on State and local policies and programs to capture public benefits of renewable 14 energy, will include topics such as ways in which 15 16 different agencies incorporate renewable energy benefits 17 into their policies and programs, barriers that agencies 18 face in incorporating more renewable energy benefits 19 into their policies, and ideas to overcome those 20 barriers.

And also, how renewable resources are currently being rewarded and how they can be better incentivized. Panel Number Three, on stakeholder and utility

24 experience and new ideas to better capture the benefits

25 of renewable energy, will include topics such as current

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policies and programs that capture the benefit values of
 renewable energy, barriers to including benefits of
 renewable energy that are not currently considered into
 policies and programs, and ideas to address those
 barriers and reduce the uncertainty about the benefits
 of renewable energy.

And as Suzanne said, we'll be accepting written comments on today's topics through April 19th. When you submit your comments please include the docket number and the title of the workshop in your subject or first paragraph of your e-mail.

And you can send those to <u>docket@energy.ca.gov</u>,
with a copy to me, Kmoore@energy.ca.gov.

And all the workshop documents, transcripts, along with more detailed instructions for submitting written comments can be found under the April 12th heading at this link.

18 Thank you all for being here and let's let the 19 fun begin with Panel Number One, Moderated by Al 20 Alvarado.

21 MR. ALVARADO: Thank you, Katie. Good morning,
 22 good morning Chairman Weisenmiller, Commissioner

23 Peterman, and Mr. Bartridge and Mr. Barker, panelists

24 and workshop participants.

25 My name is Al Alvarado, I'm with the Electricity

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Analysis Office here at the Energy Commission. It's
 vibrating.

3

(Microphone noise)

MR. ALVARADO: I have the privilege of being the 4 5 moderator for this first panel and I do think we have a 6 very interesting set of questions that I think, in 7 itself, could probably take up most of the whole day. 8 However, as moderator, I have the unkindly task 9 of moving the discussion along and trying to keep our 10 discussion within our allotted time. 11 I'm really, personally, very interested in this 12 topic since over the years I've worked on numerous, 13 different types of studies to try to understand the 14 implications of different supply and demand options, as 15 we added to the electricity system. 16 Not just in California, but also understanding 17 implications of how it affects generation dispatch 18 through the whole west and imports. 19 The scope of these questions, I think we'll 20 first start opening up with questions related to 21 identifying the types of benefits associated with the 22 penetration of an increasing number of renewables. 23 Also very important to identify not only the 24 potential list of benefits, and as we get into benefits I think we need to also consider the benefits that 25 **CALIFORNIA REPORTING, LLC**

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different types of renewables can provide, since each - not all renewables are alike and each do provide
 different system attributes.

But I think key also to the analysis would be when you add renewables how will it actually affect dispatch of the system, and as we consider long-term mplications how it might also change procurement decisions.

9 As we move along, the next set of questions will 10 also cover examination or discussion about different 11 types of tools that would be available for examining 12 these issues. And key to everything is always dealing 13 with uncertainty.

We used to conduct single-point forecasts, but I think we've moved along and any of our analysis that we engage in we do try to examine a range of potential variables and how it might affect the system.

With that, we do have an excellent group of panelists today, with a wide range of expertise. As Katie indicated, if each of you could please introduce yourself, maybe have some opening comments, but please limit it to maybe three to five minutes so we won't take away from as we move into the discussion.

24COMMISSIONER PETERMAN:Mr. Alvarado, before you25move on, I'll ask everyone to speak closely to the mic,

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1 and perhaps if you can speak a little bit louder as 2 well. Maybe it's just me, but I can't -- I'm really trving to strain to hear. Thank you. 3 MR. ALVARADO: Okay. Well, actually, so much 4 5 for my opening comments. I mean how about if we just 6 proceed --7 COMMISSIONER PETERMAN: They were heard, but it 8 was quiet as a pin and people will come in and out, and 9 I want everyone to hear the questions. 10 MR. ALVARADO: Yeah, I have an interesting 11 vibration here with this one. So with that, how about if we go down the line 12 13 and, please, if each of you will introduce yourself. 14 Arne Olson. 15 MR. OLSON: Thank you. Commissioner Peterman and Chair Weisenmiller, thank you for inviting me to be 16 17 here to speak to you on this topic, I'm really excited 18 to join the conversation today. 19 My name's Arne Olson, I'm a partner with Energy 20 and Environmental Economics and we're based out of San 21 Francisco, and we've been involved with a number of 22 studies of renewable energy, particularly in California 23 and throughout the west. And I'll spare you all the details on that. 24 25 I just have a couple of remarks that I wanted to **CALIFORNIA REPORTING, LLC**

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1 make, to start off with, and so if we can go to the next 2 slide. I wanted to sort of throw a note of caution into 3 this discussion at some point, and I know that there are future workshops scheduled on cost, but I think it's 4 5 important when we think about maximizing the value and 6 harvesting the value of renewable energy resources, that 7 we also keep in mind that costs of renewable energy 8 resources can vary.

9 You know, we know, and as Al said, that the 10 different types of renewables have different values. 11 Solar energy produces more energy during the summertime, 12 during the peak hours when it's the most valuable.

Wind tends to have the opposite provide, more production during the winter and more production at night.

16 Geothermal's kind of a nice steady resource 17 provides, you know, inertia, it's a spinning machine and 18 it has its own benefits.

19 And the benefits can vary by location as well.
20 There's been a lot of discussion in this State about,
21 you know, are there more benefits from siting renewables
22 in California versus siting them in our neighboring
23 states.

And, you know, even further now is it are there
more benefits from siting them closer to load? And we
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had sort of a good discussion at the beginning here
 about some of the benefits of distributed generation.
 So, this question of geography is important, as well as
 the question of type.

5 But I wanted to just sort of make sure that we 6 don't lose sight of the fact -- as we're trying to 7 maximize the value of renewables, that we don't lose 8 sight of the fact that the costs can be very different, 9 too.

10 And so what I've thrown up here is just a sample 11 of PV costs from various different locations, and 12 different installation types around the State. And 13 these are from the most recent PUC 33 percent RPS 14 calculated that was just posted a week or so ago.

And what we see here is, so if you look at sort of the bottom right corner you can see this would be a large, sort of ground-mounted, thin fill installation in the Mojave Desert, which would have a levelized cost according to the calculator of around \$105 per megawatt hour.

21 Another large facility, sort of a 150-megawatt 22 facility in the Central Valley would be a little bit 23 more expensive, \$120 a megawatt hour. And the 24 difference there is largely due to resource quality, the 25 sun doesn't shine quite as often, quite as consistently 26 CALIFORNIA REPORTING, LLC

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1 in the valley as it does out in the desert.

Now, as you move closer to load, the sort of the Now, as you move closer to load, the sort of the Now, as you move closer to load, the sort of the Side number up closer to the Bay Area, these would be smaller, still ground-mounted facilities, but smaller facilities don't have quite the same economies of scale.

7 And in California, as you get closer and closer 8 to the coast of course the resource quality degrades a 9 little bit so you don't get quite as much production out 10 of the same facilities as you get closer to the coast.

11 So now you have a cost difference that's pretty 12 substantial, \$50 a megawatt hour or, really, 50 percent 13 more expensive than renewables that are cited in areas 14 where there's a better resource.

And then, lastly, the highest numbers on the chart there, the \$213 in the L.A. area and \$231 in the Bay Area, these would be for large rooftop installations. These would be sort of commercial warehouse roofs, which are more expensive to install. Again, closer to the coast and so don't have quite the same resource quality.

22 So, to me, this is a big hurdle that if we want 23 to site renewables closer to load, this is the hurdle 24 that we have to get over.

25 And back to the question of uncertainty, we want CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 to be sure that the benefits that we're getting from 2 siting those renewables in those locations are enough to 3 outweigh this very different cost impact that renewables 4 have in those locations.

5 And if you want to go to the next slide, I 6 wanted to sort of think about this issue of the local 7 benefits a bit as well, and sort of talk about some of 8 the uncertainty around that.

9 And to me, this gets to the question of kind of 10 what's the optimal geography for renewable resources.

If you look at the cost profile and who pays the costs of the renewables, that's really not a local issue, that's really more of a regional issue. If PG&E signs a contract with a renewable resource, it recovers those costs from all of its ratepayers over its entire service area, not just the ratepayers in Oakland, or in San Francisco, or in the Bay Area.

18 The construction impacts of those resources are 19 experienced very locally. There are local environmental 20 impacts to those resources.

Tax base is another issue that's very, very local, it depends on are you on this side of the boundary line or the other side of the boundary line, depending on -- you know, that determines which entity gets the tax benefits from those resources.

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1 On the other hand, climate change is a global 2 phenomenon so the right geography for climate change is 3 really global. We don't care -- if the goal is to 4 reduce greenhouse gas emissions, in essence we probably 5 don't care whether the resource is in San Francisco, or 6 the Central Valley, or even in Wyoming because it really 7 is a global phenomenon, trying to reduce greenhouse gas 8 emissions.

9 So this is just some of the sort of thoughts I 10 wanted to put in here on what the right geography is. 11 Oh, and the last point I wanted to make was on

12 emission impacts. And there's been a lot of focus, I've 13 heard a lot of focus, very rightly so, on the 14 disproportionate burden that some members of society in 15 California bear in terms of emissions, in terms of the 16 environmental justice. And I think that's a very

17 important topic to focus on.

At the same time we have to ask the question, how much does renewables really help with that? If you put a PV system on a roof in Los Angeles, does that really displace a fossil-generating resource in Los Angeles or, you know, what exactly does that resource displace?

And some of the work that we've done indicates that this might displace -- it definitely displaces a CALIFORNIA REPORTING, LLC

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fossil resource that emits pollutants, but it might displace a resource in Oregon, or a resource in Northern California, or a resource in Arizona in addition to a resource locally. And what proportion of that production displaces local emissions versus regional emissions is another question that's very difficult to answer.

8 And so I think the focus on what's actionable I 9 think is really important, but I wanted to sort of throw 10 some notes of caution in there on what we think we can 11 know and what we can really analyze and assess about the 12 differences based on geography.

13 MR. ALVARADO: Thank you, Arne.

MR. NELSON: Okay. I'm James Nelson, or Jimmy Nelson, as most people call me. I am a PhD candidate in the Energy and Resources Group. I work under Professor Dan Kammen at UC Berkeley.

And so I'd like to talk to you today about some of the work that we're doing using the SWITCH electric power system model, which we've been under contract with the CEC to produce work looking at long-term, low-carbon planning.

23 Could we go to the next slide? So, SWITCH is a 24 model that's built on the idea that the long-term costs 25 and benefits of especially intermittent sources of CALIFORNIA REPORTING, LLC

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power, namely wind and solar power, can't really be valued without knowing what other infrastructure is in place once you -- once you get to the point where you have a lot of them on the grid.

5 And so this means, you know, what generation 6 transmission and storage has been built and where it's 7 been built.

8 And also, the dispatch of the electric power 9 system changes in kind of fundamental ways when you get 10 to large penetrations of intermittent renewables and 11 that changes the valuation of not only your intermittent 12 renewables, but also the rest of the power system assets 13 which should, seeing as we're thinking long term, 14 actually change your investment decision.

15 So all these things need to be optimized in an 16 integrated framework and that's kind of what we're 17 working towards. And part of the integrated framework 18 is policy and reliability constraints, so making sure we 19 have enough sub-hourly reserves around to compensate for 20 the variability of intermittent renewables, making sure 21 we meet renewable portfolio standard targets, carbon 22 targets, you know, just meeting load is even sometimes 23 problematic with intermittent renewables.

24 So, can we -- oh, sorry, the picture that I've 25 shown here is an example that SWITCH has designed for CALIFORNIA REPORTING, LLC

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1 2030 across WECC, so not just in California but across 2 the whole Western Electricity Coordinating Council. It 3 shows the dispatch of a 2030 system that meets climate 4 targets consistent with California's targets. So, this 5 one's 54 percent of 1990 emissions by 2030 which then 6 you can imagine ramping down further to 80 percent below 7 1990 emissions by 2050.

8 So, you can see that there's a lot of solar and 9 wind generation, roughly 10 percent of energy, but 10 there's enough natural gas generation to compensate for 11 the variability.

12 Can we go to the next slide? And so this slide 13 also shows how we deal with sensitivity so it's very 14 important, as was discussed earlier, to try and run 15 multiple scenarios in many cases to try and figure out 16 the possible benefits of renewables because it changes a 17 lot in the face of what grid you're looking at.

18 So this shows six different possible realistic 19 scenarios for WECC, so don't worry about all the nuclear 20 build out, it's not in California, but only if nuclear 21 becomes cheap.

And so we can show -- one of the things that SWITCH can show is what kind of costs we're going to have to pay for certain benefits. So, if we want to meet our carbon targets in WECC, the line that says CALIFORNIA REPORTING, LLC

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1 "carbon price" says that, you know, we're roughly going 2 to have to pay \$70 per ton CO2 by 2030. That's going to 3 be the -- that's one possible carbon price that might 4 result from a low carbon system. And so that, you know, 5 we need to think about whether the benefits of reducing 6 that carbon in WECC are equal to that price.

7 Can we go to the next slide? So, as I mentioned 8 before SWITCH is a CEC-supported modeling program. We 9 appreciate the CEC's support greatly, from Guido Franco 10 and Joe O'Hagan.

And so we have done one preliminary study with the CEC already, it should be coming out somewhat soon, about looking at 2050 carbon targets for California, but our model takes into account the whole WECC because there's a lot of imports and, also, you know, at times exports from California.

17 And we're also looking at high solar energy 18 scenarios, demand response, I guess electrification of 19 vehicles and electrification of heating to meet carbon 20 targets. And, of course, yes, just carbon quantity and 21 cost constraints.

22 COMMISSIONER PETERMAN: Quick question, can you23 go back to the slide with the graph?

24 What is the assumed renewable target here that I 25 should be thinking about? Is it 33 percent?

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1 MR. NELSON: So it's each state's renewable 2 target that increases over time, so for California it 3 will be 33 percent by 2020 and then it stays there through -- this is a 2030 study so it stays there 4 5 through 2030. 6 Other states have different targets that move up 7 over time. But in the end those constraints aren't 8 binding when you get to a 2030 carbon target that's at 9 54 percent of 1990 levels because there's just more 10 carbon abatement needed than the renewable portfolio 11 standards actually do currently. 12 COMMISSIONER PETERMAN: Thank you. 13 MR. ALVARADO: Thank you, Jimmy. 14 Mr. Warren Leon. 15 MR. LEON: Hi, I'm Warren Leon, I'm with the 16 Clean Energy States Alliance and we're a national 17 organization that has a large number of members of State 18 Clean Energy Agencies across the country that work with 19 us. 20 And what we do is help them exchange 21 information, identify best practices, we provide advice 22 to those various agencies. 23 And one thing I could say to you right from the 24 start is the exercise you're engaged in today is not 25 that common and it's very admirable, and you're taking a **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 sophisticated approach.

2 And the reason I say that is oftentimes in 3 states folks have a general sense that renewable energy 4 is a good idea, they have a general sense that we should 5 have more of it and then they leave it at that. And 6 they don't really start to look at what are the specific 7 benefits we're getting out of it and what are the 8 specific costs.

9 Now, I've listed a bunch of different benefits 10 up there on the slide and one thing that's important to 11 think about is that although renewable energy is a broad 12 term, it's composed of a large number of different 13 technologies and different applications.

And depending on what benefit matters most to you, certain technologies and certain applications are going to be more desirable than others. It's not the case that all renewable energy gives you all the benefits or gives them to you equally.

And in terms of the categories I've put up there on the slide, I've talked about four different ones, one is environmental benefits, which are the most obvious; things like slowing climate change or improving air quality.

24 But there are also some energy system benefits 25 that we have heard about earlier. You know, there are CALIFORNIA REPORTING, LLC

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1 reasons for reducing dependence on fossil fuel, that 2 doesn't have to do with the environment. 3 In addition to the ones up there, there's a benefit involved in deferring transmission and 4 5 distribution costs. 6 In terms of economic benefits, there are some 7 aspects of renewable energy that advance overall 8 economic growth and are good for the economy as a whole, 9 but many of the benefits of renewable energy are 10 distributed unequally. 11 Some individuals, some geographies, some 12 businesses, some types of communities benefit more from 13 renewable energy than others. 14 And one important thing to do when you're looking at benefits is to try to be very specific as to 15 16 how those benefits are distributed through society and 17 then be comfortable, then decide are you comfortable 18 with the way those benefits are being distributed. 19 And if there is an unequal distribution of 20 benefits, is there anything you can do to redistribute 21 those benefits in a way that, from your stand point, is 22 more desirable. That can have to do with either 23 emphasizing different technologies, different types of 24 applications, or finding some ways in the cost structure 25 to charge the folks who are getting the largest **CALIFORNIA REPORTING, LLC**

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benefits, charging them disproportionately so that it
 relates to what they're getting out of it.

3 One other thing I would like to say is that when 4 we look at benefits there are certain benefits that are 5 real, but oftentimes when folks go to measure them they 6 don't go beyond the theoretical.

7 And let me take the case of transmission and 8 distribution benefits. It is undoubtedly true that 9 having more renewable energy in a distributed generation 10 application allows you to defer transmission and 11 distribution upgrades.

But actually being able to pin down how much that is actually saving you, and where it's saving you, that can be devilishly hard.

There are cases where in theory you're saving transmission and distribution costs but because the utility companies do not believe that you're going to actually have enough renewable energy on the system to defer those transmission upgrades, they go ahead and make them anyway, and so you don't actually get the benefit you think you're going to get.

22 So that's another case where you need to be very 23 specific in trying to pin down where these benefits are 24 occurring and what they are.

And with that, I will pass on to the next

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1 person.

2 MR. ALVARADO: Thank you, Warren.

3 Ms. Sanders.

MS. SANDERS: Hi, I'm Heather Sanders, I'm the Director of Smart Grid Technology and Strategy at the ISO. I'm filling at the last minute for Mark Rothleder, who was called to the PUC late yesterday. So, I will do my best to answer the questions and provide the information from the ISO perspective.

10 So what we wanted to focus on for the opening 11 comments is, really, what is the ISO role in talking 12 about these benefits?

And from our perspective, we have been engaged in a number of operational and planning studies to understand what the impact is and the benefit of the renewable generation on the system.

So to list the studies that we are engaged in,
on an ongoing basis, and I do not have slides unless
Mark sent some -- I don't have any slides.

First of all, transmission planning, of course, from an adequacy and needs perspective to support the renewable scenarios. And those scenarios have been defined through the CPUC, LTPP and other areas external to the ISO. So, we're focused on the scenarios defined by others, as well as the CEC RETI.

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1 Operational impact studies on reserves for 2 flexibility because as you know, with renewables and the 3 uncertainty that those introduce, we have to have more 4 flexible capacity on the system.

5 Operational impacts on frequency response and 6 inertia. So, as we reduce the spinning mass on the 7 system, the governor-controlled natural and conventional 8 generators, we have to make sure that we're able to have 9 enough frequency response on the system so we can 10 recover in contingency events.

11 Market effects, unexpected energy prices and 12 revenue adequacy. Again, conventional generators and 13 the impact on their revenue adequacy, as well as other 14 participants in the market, are impacted with renewable 15 generators of low, zero fuel cost.

And we're also engaged in production simulationsthat provide insights into this fuel and emissions cost.

In our transmission planning role, the ISO can help ensure that renewable resources can be efficiently and reliably accommodated, you know, based on the

21 different scenarios that are put forth.

And the ISO can help provide for the societal benefits by incorporating the costs into the dispatch. So by doing this, the reduction of greenhouse gases due to dispatch can be realized.

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1 And I phoned a friend while I was sitting here, 2 you know, this is the great thing about technology, from 3 the 33-percent studies that we've been doing, and this was filed in testimony in the PUC's LTTP proceeding I 4 5 believe last June, of 2010, WECC-wide our production 6 simulation, so this is just production cost, not transmission cost, but production cost simulation is 7 8 looking at about a \$2.5 billion savings over an all-gas 9 case.

10 So, we did a study based on if you had all gas 11 units, again that's not a 33-percent scenario, against a 12 renewable case, and we got about \$2.5 billion savings 13 WECC-wide.

And then to serve California load it's about a 15 \$1 billion savings over an all-gas case for a 33 percent 16 renewable case.

17 So, I thought I'd just start out by saying what 18 the ISO's role is and I'll do my best to answer your 19 questions as we go through. Thank you.

20 CHAIRPERSON WEISENMILLER: Okay, just one quick 21 question, Heather. That's 2.5 out of what's the total 22 number, or one out of, again, a total number, just 23 trying to get a sense of the percentage.

 MS. SANDERS: Oh, I understand. The all-gas
 case projected a production cost of \$20.5 billion and CALIFORNIA REPORTING, LLC

the renewable case projected a production cost of \$18.5
 billion.

3 Now, there's a lot of assumptions in there and a lot of what was said earlier, depending on how you 4 5 assume costs and so forth, so we assumed average costs 6 and so forth, but those are the high level numbers. 7 CHAIRPERSON WEISENMILLER: Thank you. 8 COMMISSIONER PETERMAN: And then just to follow 9 up on that, and so those savings are from -- can you 10 explain more what the savings are from? 11 MS. SANDERS: The savings are mostly from the 12 cost of those generation resources, fuel costs, their 13 dispatch cost, so we're talking about production cost. 14 COMMISSIONER PETERMAN: And do you see those results changing in light of projections for lower 15 16 natural gas costs? 17 MS. SANDERS: I don't know. I don't know what 18 the natural gas cost assumption was, so I would assume 19 they would go down. Help. 20 MR. OLSON: Yeah, this is Arne. I think they 21 would -- those probably used sort of \$5.50, so I think 22 if we would do that study again, today, those gas costs 23 would be more like \$3.50 to \$4.00 in 2020, so you would 24 be a proportionate reduction in that dispatch cost 25 savings.

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COMMISSIONER PETERMAN: Thank you.

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2 MS. LAZEROW: Hi, good morning, my name is Shana 3 Lazerow, I'm a Staff Attorney at Communities for a 4 Better Environment.

5 I'm actually here, today, on behalf of the 6 California Environmental Justice Alliance, CEJA, which 7 is working statewide around energy issues from the 8 perspective of our members who are living in low-income 9 communities of color and are very concerned to see that 10 the energy system change over to a just distributed 11 generation system.

I really appreciate this workshop being held.
It's vital for our communities and for the State, as a
whole, to be deliberate about how we change our system.
So, a lot of really good work has already gone
into this process and it's wonderful to see it in the
summaries.

I wanted to highlight a couple of real concerns that our communities have. So, as you all know, from a public health and environmental justice perspective we are going to need to transition from the status quo to a new system.

23 And the benefits of that system, as Warren 24 pointed out, should be quantified and we need to decide 25 whether they're going to be equitably distributed CALIFORNIA REPORTING, LLC

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1 throughout the State and how we're going to do it.

2 So, I wanted to take a moment to just kind of 3 highlight some of the impacts that our members are 4 actually, today, although if it's like this in L.A., 5 maybe not today, suffering from the existing system. 6 I wanted to talk about one of the OTC plants that's currently operating in Wilmington, it's called 7 8 Harbor. It's one of the newer OTC plants. It's in --9 basically in the Port of L.A. 10 We have members who live in Wilmington, the 11 fence line to one of the refineries, the Conoco 12 Refinery. There are five refineries in that area, 13 there's the Port Of L.A. There's a freeway that has 14 constant goods movement of diesel trucks. 15 It sits on the third largest oil field, so there 16 is -- next to our Little League field there's oil 17 drilling going on. 18 And on top of this, on the hottest peak days 19 there's the Harbor OTC plant which is cranked up. 20 And so I was interested to hear that E3 is not 21 at all confident that distributed generation is going to 22 displace local gas-fired generation because the CEC's 23 2010 OTC report sort of went through, at least for the 24 older generation and the OTC plants, which were not 25 designed to be peaker plants, that they are actually **CALIFORNIA REPORTING, LLC**

1 running during the peak at the moment.

2 So, my hope would be that if we can smooth out 3 the peak through a distributed generation system that, 4 in fact, it would displace that use.

5 And it's my understanding that there are 6 transmission bottle necks, that when you're at peak sort 7 of prevent some of that Northern California power from 8 coming into our community in Wilmington, or even the 9 L.A. Basin.

But as I said at the start, I'm a lawyer, so Iwould defer to your technical analysis.

12 So I also wanted to point out, and if we can 13 flip to the next slide, please, that if we do nothing 14 this is what we're going to get to replace those OTC 15 plants.

16 Some of you in this room may remember the 17 proposed run-in power plants, CBE fought this plant for 18 two years. These are the projected emissions from this 19 plant, which the CEC approved, all but for the air 20 analysis.

East South Coast Air District approved all but for the Federal requirement that these emissions be offset with valid offsets, which the Air District wanted to provide but a couple of lawsuits stood in its way. So, the South Coast Air District estimated that CALIFORNIA REPORTING, LLC

this plant would kill about 11 adults each year. There
 were other health impacts from these air emissions.

3 Vernon sits in Southeast L.A., which is a very 4 densely populated part of Los Angeles. It's about 99.8 5 percent people of color, very low income, and the City 6 of Vernon is an industrial city surrounded by communities like Huntington Park, where CBE's office is. 7 8 So, this power plant was not acceptable to our 9 community and as a substitute for the Harbor Power Plant 10 is not really a good option. So, I wanted to talk a little bit about the 11 12 benefits that we are expecting from the new system in 13 our communities. We are expecting, first of all, that 14 this new system will provide answers other than the

15 Vernon Power Plant, or other similar gas-fired plants in 16 our communities or in someone else's communities.

We believe that a distributed generation system will address a lot of the peak demand, which is what the new power plants are being proposed to address.

Also, renewables generation is the other, you know, basis that we're hearing for siting new power plants, like Vernon.

And I believe there are technological fixes for this. There's a lot of -- every day you hear new

25 storage solutions coming on the market.

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1 So I believe that between bringing online a 2 distributed system that, yes, does site some of the 3 generation in low-income communities of color, on your 4 more expensive side of the State, which is where the 5 demand is.

6 And if you could actually flip to the last 7 slide; so this is a map of where the installed solar is, 8 now, you'll see "California now." This is a map that 9 came out of UCSD. I'm not actually sure what the "now" 10 date is.

But I think that given the discussion around local capacity requirements in our State, we know that the demand tends to be more on the west side of the State.

And as you can see, the generation is more on the east side of the State, which is certainly a problem if what you want to do is replace your old power plants with a renewable system.

So, I trust that this group is the right groupto help move that process forward. Thank you.

21 MR. ALVARADO: Thank you, Shana.

22 MR. MACHOL: Hi, I'm Ben Machol, I manage the 23 Clean Energy and Climate Change Office of the USEPA, in 24 our Region 9 office.

25 You know, I have some animation on these slides CALIFORNIA REPORTING, LLC

1 and I don't know if it will work. So, if you want to 2 just scroll forward until you see the word "particulate 3 matter," it will probably be easier to do that.

I was going to lead up to this, but I might as
well just get it all out there at once.

6 So, the main thing that I want to talk about 7 here is, you know, we know what the retail price is of 8 the electricity that we purchase, we have this bunch or 9 panelists who have already talked about the external 10 costs, we try to quantify what we can.

I wanted to focus in on the health impacts but, more specifically, the health impacts from air emissions and even more specifically than that, the health impacts from air emissions from particulate matter levels.

And I wanted to focus there just because this is an area that we have ready access to power plant emission data from around the country. We can easily quantify the health impacts from changes in particulate matter levels. I'll probably start saying PM at some time, it's still particulate matter.

21 And we can monetize those impacts or I guess 22 more accurately we can assess the economic value of 23 avoiding those impacts.

24 So, when I'm talking about benefits to renewable 25 energy, I'm really looking at some of the costs of

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1 fossil fuel electricity.

So, when we look at those numbers we look at the health impacts, monetize those and just divide out by the kilowatt hours of power that were produced when those emissions were created.

6 You can look at California electricity and find 7 that on average, for what's generated in the State, 8 those health impacts run -- again, health impacts, just 9 that subset from PM emissions, or secondary formation of 10 PM, it's about a penny-a-kilowatt hour.

And when you look at the energy that's imported into the State, that number rises to about three to seven cents a kilowatt hour.

And can you go to the next slide? So, another way to look at this is by fossil fuel source. So, you know, our mix in California, on a fossil fuel level,

17 almost all natural gas.

18 And when it's imported, of course there's more19 coal in the mixture as well.

If you look around the country and you look at the PM that's caused by the emissions from power plants, you get roughly 32 cents a kilowatt hour is the health impact of cost of coal, about 13 cents for fuel oil, and natural gas in the two-cents-a-kilowatt hour range.

25 So, you know, these are significant, but largely CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 ignored when we set energy policy just because it is
 difficult to quantify.

But we can look at PM emissions from power plants and we can put some numbers to it. But as we set policy today usually, because it's hard to quantify, we set it to zero.

7 That's all I wanted to start with.

8 MR. ALVARADO: Thank you, Ben.

9 Ms. Mann.

10 MS. MANN: Thank you. I'm Margaret Mann, I work 11 at the National -- hi, I'm Maggie, Margaret Mann, I work 12 at the National Renewable Energy Laboratory, in Golden, 13 Colorado. We're a national laboratory, funded largely 14 by the U.S. Department of Energy.

15 My particular background is in economic analysis 16 of specific energy technologies, as well as lifecycle 17 assessment to quantify environmental benefits and 18 drawbacks of various technologies.

I always like to say that the worst thing that could happen to me in life is, you know, years from now when I'm retired and, you know, planning my next excursion that the Sierra Club comes and knocks on my door, and says that we got it all wrong.

I don't want that to happen. I really believe that we need to take a very close look at the

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technologies and systems we're talking about deploying,
 and supporting, and making sure that we're making the
 right choices.

When I started at NREL, you know, renewables as a big thing was kind of a dream. We didn't -- we thought we were still needing some very basic research. You know, the installation of renewables was few and far between and I'm just amazed at how far we've come. It's really, really a delight to see how things have progressed.

And I think even with everything that we've deployed and looking at actual installations we can say that renewables do continue to offer benefits in the areas of the three E's, the environment, the economy, and energy security.

In my view, after doing analysis of renewables and conventional energy, both transportation and electric technologies, it's my feeling that what we need now is greater certainty in the quantifications of these benefits, along with greater dissemination of the benefits.

I am an analyst, but I really would like to say that we don't need just more analysis, we don't want to become paralyzed and stop in our tracks because we can always analyze more.

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But right now the message to policymakers and decision makers is very mixed. We can always go and do literature reviews and pull together the greatest experts and they can talk about their individual papers. I mean we have our own, as well. And I think we should do that.

But I think that right now policymakers are stuck and trapped because they receive so much input. One - somebody might come to them and say, you now, the answer is 62, and then the next guy says no, no, my study says the answer is 94. And it's very hard for decision makers to have confidence in moving forward with this kind of very mixed message.

Now, we've gotten really good at doing really cool analysis work over the years. I mean the work that's recently been done at UC Berkeley, that was spoken about earlier, is just a really, really cool study.

And we've recently completed a study looking at high penetration of renewables on the grid across the U.S. and it's, in my mind, one of the greatest break throughs in being able to pull all of these -- all of this knowledge base together so that we can really understand what could be ahead of us, and where might we get stopped, and what might be the problems and,

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1 therefore, what to focus our efforts on.

2 But these really cool analyses can be hard to 3 drill down into and really understand what's going on.

4 So, I am an advocate of taking a step back right 5 now and pulling together the vast knowledge that we've 6 been able to put forth and try to distill it into more 7 common messages.

8 Right now everybody, since the economic crash,
9 the most commonly wanted benefit is jobs, jobs, jobs.
10 It's jobs.

11 You know, I've seen in my career greenhouse gas 12 emissions being the most important part, water being the 13 most important part, and that's actually coming around 14 again, of course.

15 I'm from Colorado, I know California, you know,16 as western states we think a lot about water.

And right now, I mean it's only jobs, that's all the policy makers are focused on. And to me, you know, this too will pass and we will then focus on something else.

I think it's really important for us to understand that the public perception and, therefore, the force behind what gets deployed is driven by public perception of what's important right now.

25 So, it has very little to do with the whole CALIFORNIA REPORTING, LLC

suite of benefits, all of the things that we can care about or really, you know, what we've quantified in all of our studies, it's being nimble enough to understand that it is a multitude of benefits and we can quantify and discuss the benefits in all of those areas.

6 The benefits of renewable energy depends, as Mr. 7 Leon was saying, on the technology, the location and the 8 existing system into which the renewable energy is 9 deployed. We can't -- on some of these technologies we 10 can paint a broad brush and say that there are benefits 11 that we can really feel confident about no matter where 12 the system is deployed.

Of course, there's always going to be a range in that, the number's never going to be 64.2. But we do need to make sure that we understand what the uncertainty in our assessment is and how location, and technology, and existing system-specific those benefits are.

In my mind, the most important thing for really moving deployment forward is a better understanding of the range of benefits that can be seen, pulling together everything that we've been working on over the last 15isth, 20ish years, and so that we can have a clearer message for the decision makers.

25 In terms of technical areas, I think that we **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 have to be very concerned about the need to expand 2 infrastructure. You've got a very large NIMBY syndrome 3 when we talk about putting large transmission lines in 4 an area, you've got, you know, the question of what 5 could be deployed where and what would be displacing 6 somewhere else.

7 There are environmental impacts of 8 infrastructure that we can't ignore. And then, of 9 course, how are we going to fund what's necessary for 10 infrastructure?

11 There's great integration, curtailment, and 12 dispatch protocols that need to be focused on. We have 13 a lot of really great studies that touch on those but we 14 really need to start talking about, well, what will we 15 do with large scales of penetration in various places, 16 how would we dispatch the renewables, what would be 17 curtailed.

Water availability and variability, most renewables use less water than conventional thermal, fossil-fueled power plants, but some of these technologies will have to find ways in which to displace the right water in the right places, because water is not evenly distributed.

24 Concentrated solar power, the map of California 25 shows that a lot of the solar resource -- I mean,

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really, California, you have wonderful solar resources.
 So, even if it's yellow where you are, that's still
 awesome.

But, of course, the red, the really great solar 4 5 resource, is out away from the population centers. And 6 we're talking about things like concentrated solar power 7 which, if we need to do dry cooling, which is 8 technically feasible, it will hurt efficiency a little 9 bit and cost a little bit more. 10 And then I think we need the consistent or at 11 least consensual understanding of the magnitude of the 12 likelihood of the benefits. 13 And we have a lot of very significant and high quality understanding of the resources. We know where 14 the resources are. One of the issues, though, is 15 16 financing the specific projects and how specific that is to an individual municipality or a state. 17 18 Thank you very much. 19 MR. ALVARADO: Thank you, Maggie. We have about 20 50 minutes to really cover all of these questions and I 21 think --22 COMMISSIONER PETERMAN: I actually have a 23 follow-up questions for Ms. Mann, if you don't mind,

24 before we move on.

25 MR. ALVARADO: I'm sorry, Commissioner Peterman.

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COMMISSIONER PETERMAN: Sorry to interrupt, I
 just wanted to catch you while you were still on that
 thought.

So, you were talking about magnitude and the range of studies and so in terms of an orders-ofmagnitude estimation I mean are you saying consistency across the different studies in terms of the orders of magnitude of some of these public benefits, as well as the sign on them, consistently being positive?

MS. MANN: Well, it depends on the benefit that you're talking about.

12 COMMISSIONER PETERMAN: Okay.

MS. MANN: I can give a concrete example about greenhouse gas emissions because we've just recently finished up a very large study of the META analysis of the literature.

17 So, you know, we had people, decision makers who 18 would say to us, well, I heard that the greenhouse gas 19 emissions of PV are worse than coal, or I heard -- you 20 know, and so they keep hearing these studies, they keep 21 hearing what's in the press.

And so what we did was we took all of the peerreviewed literature and we analyzed it, and brought as much into consistent understanding as we could in order to define the variability, the median values.

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1 So for the case of wind, you know, you can say, 2 okay, it doesn't matter if someone says the greenhouse 3 emissions are 35 and somebody else said they're 25, 4 relative to, say coal, that's still low and the 5 variability is not great.

6 Now, other technologies have greater variability 7 and so then that allows you to go in and see what the 8 magnitude is and what causes that variability in 9 understanding. Sometimes it's a one-off study, looking 10 at a specific location which, of course, you're going to 11 get differences and sometimes it's a variation in the 12 assumptions.

13 Those things need to be talked about so that the 14 policymakers really feel more confident in the 15 information they're receiving.

16 And I think that applies to even -- to all the 17 benefits and even including those that are difficult to 18 quantify.

19 COMMISSIONER PETERMAN: Thank you, that's very 20 useful because one of the overarching questions I have 21 is as we think about what the different benefits are 22 that we're not capturing, if we do capture them and 23 monetize them does that ultimately change, overall, what 24 the State will procure?

25 Does that ultimately change how much solar we'll CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 want relative to wind? And so there's the -- does it 2 change what we buy?

And then there's the next question of it might change where you locate it and it seems like that's been a key issue raised here.

6 Al, I have some overall observations from just 7 what I've heard so far, if you don't mind me sharing 8 them.

9 MR. ALVARADO: Please.

10 COMMISSIONER PETERMAN: With questions. So, as 11 you then answer various questions, you'll have a sense 12 of some of the things I'm thinking.

Great information so far, a couple of thoughts come to mind. One, it seems like the technologies we choose to integrate renewables can have significant impact on the renewable benefits.

17 And looking at the work presented about the 18 SWITCH model, and also some of the comments from the 19 ISO, there seems to be, still, substantial reliance on 20 natural gas plants as the integrating technology. And 21 so, you know, I think that's an interesting observation, 22 as well as what the assumptions on the share of DG are 23 going to be seems to have an impact, as well, about some 24 of the, particularly, local benefits.

25 And so I'd be curious to hear from Jimmy, as

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1 well as Heather, what the assumptions were about DG in 2 the models they discussed and they presented. 3 Also, a key question is what plants are being displaced? There seems to be a mix of views about 4 5 potentially what will be displaced versus, perhaps, what 6 the expectation is around what will be displaced. 7 And, also, I haven't heard anyone talk at all 8 about bioenergy. And one of the comments that we heard 9 during the summer was that bioenergy has these other 10 benefits, such as fire reduction, for example. 11 And I was just wondering if in some of the 12 models did this come up or if it's factored into any of 13 your calculations? 14 And so those are some of the things I've been 15 observing. 16 The Chair? 17 CHAIRPERSON WEISENMILLER: Yeah, I had, also, 18 some observations and questions. 19 First, on the environmental impact side, 20 probably the article that I always look back to is one 21 that was done by Holdren & Budnitz, an annual review of 22 energy article in the, let's say, late seventies, early 23 eighties. 24 And that actually -- I mean both of them spent 25 their careers on it in a way and that article sort of

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1 captured a lot of things, but at the end concluded there 2 were certain things you really couldn't come to grips 3 with, and so they sort of stopped trying in a way. 4 And so part of it was obviously energy --5 production of energy has environmental consequences, all 6 of them do. And so the question, in part, is what are 7 the big picture things that are not captured? 8 And so from their perspective, obviously when 9 you say look at nuclear, you've got to worry about 10 proliferation, which is a real, you know, civilization 11 threatening issue. 12 When you look at coal, climate change, and when 13 you look at oil and gas, you're really tied into the 14 geopolitics in the Middle East. 15 And so, as we go through and try to do some of the quantification of stuff, those are very big effects 16 17 that no one's really done a very good job of 18 incorporating in our calculus. 19 Although, certainly one would argue like the 20 California nuclear laws in part reflect some of those 21 concerns although, obviously, what we do in this State 22 doesn't drive global proliferation issues. 23 And, obviously, some of these technologies have 24 implications, like Carla had mentioned, Commissioner 25 Peterman had mentioned the benefits of biomass in terms **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 of forest control.

2	But at the same time, when you look at the
3	German study, where they tried to quantify the
4	environmental benefits of renewables, they actually
5	found offsets for biomass, in particular, emissions.
6	And so, you know, and they found that to be
7	relatively significant, you know, and I think certainly
8	from their perspective, particularly the emissions from
9	biomass plants were much greater than, say, from gas
10	plants.
11	So I would be interested in getting, you know,
12	South Coast's site and, you know, particulates are a key
13	part.
14	So, you know, really trying to quantify the
15	environmental implications are important. But, again,
16	there are certainly offsets and it's certainly
17	complicated on the things that are not easy to model.
18	I think the other thing to really key up in
19	terms of benefits of renewables, which partially gets to
20	the displacement part, but when Edison was justifying
21	the steam generator retrofits of San Onofre, in the
22	early 2000ish period, they quantified two significant
23	benefits. One was transmission that, you know, as we're
24	finding without SONGS it has real implications for the
25	transmission system and the operations in Southern
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1 California.

But the other thing they did was natural qas 2 3 benefits and they found substantial benefits, which they quantified. And basically, you know, it's a fairly 4 5 simple analysis that if you have a nuclear plant which 6 reduces, you know, fossil fuel consumption or natural 7 gas consumption, that that reduced consumption, when you 8 look at the elasticity of natural gas, would tend to 9 drive down natural gas prices.

10 And so, even relatively small reductions in 11 price, once you look at the quality of gas consumed, are 12 fairly significant dollar amounts. And, certainly, 13 that's not something which I've seen in these types of 14 analysis here which, again, I think people need to start 15 building that in.

And that we talk about volatility but I mean, again, it's very simple, if you reduce the demand for gas relative to the supply curves, you're going to have some price effect.

20 Certainly, the other issue which the Germans 21 talk a lot about, which we don't talk as much about, is 22 merit order, in the sense that as you -- a lot of the 23 technologies that we're talking about, like PV, you 24 know, frankly, reduce demand. They don't have 25 characteristics like peakers, they're not lot power 26 CALIFORNIA REPORTING, LLC

1 plants, they reduce demand.

2	And by doing that, again once you look at the
3	loading order of generation, you're reducing what's
4	operating. Right, again, so it's sort of an elasticity
5	effect. And so, again, you have a savings. And,
6	certainly, the Germans have done a lot of quantification
7	to, say, from all their PV and the benefits of it.
8	Again, they're not necessarily seeing the future
9	liability benefit, but they are seeing the benefit by
10	reducing energy demand, electricity demand, that you're,
11	you know, displacing your less efficient generation.
12	I guess that's also occurring in Texas, that
13	Texas is really reducing gas generation there and
14	getting to use the more efficient units operating, but
15	also reducing gas costs by doing that.
16	So, again, those sort of effects on the markets,
17	particularly as we go to large-scale renewables I
18	mean if we're talking about small amounts, that's one
19	thing. If we're talking 53 percent, you know, these
20	have significant impacts on our system.
21	And we haven't talked very much about that. I
22	guess the other two things to talk about are, you know,
23	certainly it's always interesting to look at the
24	projections out to 2030 in the sense of we've done these
25	types of things in the past, where you go out 20 years
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1 or something. And then eventually, when you go back and 2 look at them, and you try to figure out why you're 3 wrong, because you always are wrong, and then you try to figure out what caused that, you know, there's 4 5 substantial uncertainties as we go forward. 6 I mean, typically, I've found fuel, fossil fuel 7 prices -- again, if you look at forecasts we did in the 8 1980s for the value of assets, and you look at them now, 9 you know, no one expected gas prices to go through the 10 ups and downs they've gone through, or oil prices, or 11 the volatility. 12 so, I think one really is deluding themselves if 13 they think we can do a very good gas or oil price 14 forecast out to 2030 or 2050. And, similarly, regulatory change; again, I 15 16 remember doing forecasts of the value of power plants 17 and we -- you know, we really didn't realize that gas 18 was going to be deregulated, which had huge 19 implications. 20 So, again, or as you go through, so in terms 21 of -- or environmental regulations. 22 Again, it's just that you do these huge 23 forecasts and there are very detailed things in those 24 but -- and sometimes you hope that things offset some of 25 these central limit theorem, that if you have enough **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

different variables you're going to be wrong on some,
 high on some, and low on others, and you hope they
 offset, and we certainly saw that type of effect.

But, again, there's a lot of uncertainty. And, again, like when I looked at the results, you know, from the modeling, I'm sort of wondering are the differences significant, you know, within the range of uncertainties for some of these things in 2030.

9 And another way of looking at it was when Amory 10 did -- reinventing fire, now. I mean his argument is 11 looking at the differences on these mega scenarios, that 12 they're not significant. You know, he has dollar 13 differences, but that the types of energy systems we 14 would need between now and 2050, that the differences 15 are really noise or uncertainty.

16 So I mean that's, again, something we have to 17 really focus on is when you do the quantification are 18 the differences significant or are they illusory.

19 And, you know, finally, I would suggest we
20 really have to think about this more in terms of risk
21 and hedging those risks. That, again, from any
22 portfolio you want a balance of -- you want to balance
23 your risk by hedging and so you're not going to put a
24 lot of -- you know, you're making bets one way or
25 another, and so you want to make sure at least the most
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1 likely outcomes are hedged, even though you don't know 2 the precise outcome.

3 And so, again, I think one needs to think more 4 and more about renewables in the context of a hedging 5 strategy.

6 Anyway, those are certainly the types of things 7 I would encourage people to talk about. I sort of --8 you know, when I asked Heather the range, again she was 9 saying it's about ten percent.

10 So, again, is ten percent with the modeling, you 11 know, is that -- it sounds like it's probably

significant but certainly, again, the further out you 13 go, the less confidence I would have that ten percent is really a meaningful difference. 14

12

15 COMMISSIONER PETERMAN: What's the ten percent, 16 what ten percent are you referring to?

17 CHAIRPERSON WEISENMILLER: Well, she had talked 18 about the difference between an all-gas case and one 19 with 33 percent renewable.

20 So, again, it may be much more in terms of 21 hedging benefits than, necessarily, the precise dollar 22 values.

23 COMMISSIONER PETERMAN: So discuss.

24 MR. ALVARADO: Okay, we do have about 40 minutes 25 to cover these nine questions, but I think some of them

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1 can be sort of grouped together.

A number of you have already -- starting with the first question, we talked about what are the public benefits that various renewable technologies provide, and that's a two-part, and what benefit or benefits are the most important drivers for the increased penetration of renewable energy.

8 Now, a number of you have discussed, provided a 9 list of potential benefits. I was wondering, maybe, if 10 we can either narrow the focus in terms of key drivers. 11 Warren, you had a very good list in your slides. MR. LEON: Well, let me say a couple of things 12 13 about this. Yeah, I think we had a lot of benefits 14 listed out there, but when you talk about the key drivers of renewable energy development across the 15 16 country, I'll go back to what Margaret was saying 17 earlier.

18 That early on, in states across the country, the 19 key driver was just a general sense that renewable 20 energy was good.

21 Now, the main driver in states, influencing 22 state policy, is the issue of local jobs. But it tends 23 to be promoted in a fairly simple-minded way, and that 24 is people focus on the jobs they can easily count and 25 easily see. Where, you know, they could say, hey, this 26 CALIFORNIA REPORTING, LLC

1 facility opened up in this community and that led to 42 2 people working at that facility, and they don't count 3 the jobs, as being as significant, the ones that are 4 harder to count on.

5 You know, for example, if you reduce imports of 6 natural gas into the State, to what extent does that put 7 more money into people's pockets and thereby they spend 8 that money on something in society, and that causes more 9 jobs to be created.

10 Or to what extent do more distant renewable 11 energy facilities that come online, even if they're out 12 of state if they come online at a lower cost, and that 13 puts more money into people's pockets, does that create 14 more jobs than actually having the facility local where 15 you could count up those jobs.

16 So at the moment the main driver on the policy 17 front is this issue of local jobs.

One thing I would -- listening to this whole conversation, I would suggest what might be a useful exercise and to get folks -- you know, we could do some of this, and folks at the National Renewable Energy Lab could do some, is to put the issue of uncertainty into three categories.

In terms of public benefits of renewables, you
could ask what are the things we feel pretty confident **CALIFORNIA REPORTING, LLC**

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1 we know about the public benefits of renewables? 2 There are certain things we know within a 3 relatively modest amount of margin of error. Then, on the other side, there's a area of what 4 5 are the things that are uncertain and are inherently 6 uncertain and we're not going to be able to get too much 7 further in narrowing the band of uncertainty. 8 That goes back to some of the things that 9 Commissioner Weisenmiller was saying, that if the 10 benefit relies on an accurate prediction of the price of 11 fossil fuels 20 years from now, you're going to have 12 some inherent uncertainty in that prediction of that 13 benefit, and you've just got to live with that. 14 Then there's a third category where there's currently uncertainty, but if we did a little more 15 analysis, we'd be able to figure it out and have a much 16 17 more accurate estimate of what the benefit is. 18 An example of that is this issue that 19 Commissioner Peterman talked about, which has to do with 20 bioenergy. That's a case where, with a little more 21 analysis, you could narrow down and have a much better 22 sense of what the benefit is and you could quantify 23 that. 24 The reason why I say more analysis is needed in 25 that area is that, first of all, there's been a **CALIFORNIA REPORTING, LLC**

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gradually improving understanding of how biomass impacts
 issues like global warming. There's a much better
 understanding now, than there was five years from now - five years before now.

5 And then the second thing is when it comes to a 6 benefit related to bioenergy, a lot of it is very 7 regionally and locally specific. You can't just take 8 the study that was done in Massachusetts, or Germany, or 9 Oregon and assume it applies here in Massachusetts. But 10 with some analysis you could have a better sense of 11 what's going on in California.

12 So, I would suggest you try to put your benefits 13 into those three different categories of uncertainty and 14 focus on the ones where you can get a better

15 understanding.

16 COMMISSIONER PETERMAN: I think that's a
17 reasonable framework, thanks.

18 MR. ALVARADO: Jimmy, I'll focus on you. I 19 think your study using the SWITCH model, you do go out 20 quite a few years, but it appears that you've added 21 different types of renewable technologies, and given 22 some of the curves you probably could glean different 23 types of benefits. 24 I was wondering if you could maybe expand a bit

25 and focus on what your observations were in terms of

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1 some of the more key benefits from your study.

2 MR. NELSON: So, one of the more interesting 3 things that I haven't shown here is that for our study 4 with the CEC, looking out to 2050, the kind of relative 5 benefits of peak and off-peak for solar and wind change 6 if you do more drastic changes to the energy system, 7 like electrifying vehicles and electrifying heating.

8 So, electrifying vehicles and electrifying 9 heating also combine with energy efficiency, which moves 10 your load down, in general, kind of in all hours but 11 perhaps most in the peak hours, because that's where 12 you're targeting, and end up making a nighttime peaking 13 in the winter system, as well as a summer peaking 14 system.

15 So, that changes your idea of whether solar is 16 kind of the marginal resource displacing the marginal 17 generator or not.

18 And I guess more broadly to answer this 19 question, one of the things that I was thinking about is 20 what is the most important driver for increased 21 penetration of renewable energy and it's hard to not 22 think of carbon as one of the most important drivers. 23 But if you think about what the State can actually do 24 for carbon, it's really rather a small percentage of 25 global.

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1 And so it seems like what we're doing in this 2 State is helping to buy down carbon technologies and 3 also using our keen intellect to really go at driving 4 down these technology costs. So, that seems to be a 5 benefit that's difficult to quantify, but is a real 6 benefit of kind of disseminating this technology to the 7 world.

8 COMMISSIONER PETERMAN: I do have one follow-up 9 question for you, Jimmy. In the scenarios you presented 10 you had a high gas case and I didn't see, what were your 11 assumptions for PV costs, in particular, or wind costs 12 in particular, what was your most optimistic least-cost 13 assumptions there?

MR. OLSON: So these cases didn't include anything like a sun shot scenario, where you get down to like a dollar a watt for PV by 2020. I want to say the central station PV cost got down to about \$2.20, \$2.50 a watt by 2030 and I think wind is probably \$1.70 a watt.

19 So, the solar costs are less aggressive than the 20 sun shot, but then they're more aggressive than kind of 21 people who don't think that solar energy's going to get 22 down very far.

23 MR. ALVARADO: The second question gets into 24 health impacts, but maybe before we get there I was just 25 wondering if I can open it up to any of the other

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1 panelists, if you have any comments about any of the key 2 benefits that you think we really should consider with 3 different renewables?

Well, let's jump to the health question, then. So this question focuses on to what extent to renewable energy resources reduce localized pollution impacts and provide public health benefits?

8 I think that the natural first person to pick on 9 might be Ben, since he's done some health impact 10 studies.

11 MR. MACHOL: Okay, and I guess I would be --12 going back to Warren's bucket of uncertainty, I would 13 put public health impacts in the pretty well known 14 category.

For fossil fuel power plants I mean we know how much emissions are generated, we know the health impacts, and for particulate matter that includes

18 decreased lung function, increased asthma rates,

19 bronchitis, heart attacks.

20 And from an economic value point of view, the 21 largest one would be premature death.

So, we can evaluate the health impacts and every time EPA does a new air rule we look at the costs and benefits of our rules, so we know how to monetize those impacts, we do this routinely.

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1 And it's only taking it one step further to take 2 those monetized health impacts and put it on a per-3 kilowatt hour basis.

So, again, when you do that, California with natural gas as a primary fossil fuel source here, it's a relatively clean grid. But you still -- those monetized impacts come in the one cent or so per-kilowatt hour range.

9 And when you look at the impacts from imported 10 fuel, it's more in the three- to seven-cent range, which 11 still is a very significant number.

I mean if you look at other states, in Texas it would be closer to 15 cents a kilowatt hour,

14 Pennsylvania, more like 50 cents a kilowatt hour. So,

15 looking at other states it looks great here, but still

16 there's a huge opportunity to look at those health

17 impacts, that you're avoiding, by switching to non-

18 combustion sources of fuel -- of energy, and building an 19 energy policy around that.

If you just compare, look for the lowest priced alternative, including health impacts, you can really make a huge difference in choices.

 23 COMMISSIONER PETERMAN: Ben, a follow-up
 24 question. So, you used the average California gas
 25 emissions. I was wondering if you had any information CALIFORNIA REPORTING, LLC

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1 about looking at, perhaps, areas most concentrated in 2 the State with the least efficient plans, with the 3 peakers, who would that value change? You mentioned the 4 cent per kilowatt hour, would that be a higher value if 5 we're going to displace specifically in those areas?

6 MR. MACHOL: There is. I mean it's always going 7 to be the older plants, the less-efficient plants that 8 are going to have dramatically more impacts.

9 And if you're talking about something like coal, 10 which may not be relevant in-state here, but I mean it 11 could go from, you know, 10 cents a kilowatt hour to a 12 dollar, two dollars a kilowatt hour at that plant with 13 the least controls.

For natural gas it's a much tighter range and, you know, 30 percent of the natural gas plants would be more than two cents a kilowatt hour. So, 70 percent of them would be, you know, much less, they would be two cents a kilowatt hour or less.

19So, a narrow range but, still, I would say two20cents is very significant when you're comparing

21 different energy alternatives.

22 COMMISSIONER PETERMAN: Thank you.

23 MR. ALVARADO: Well, there's a second part to 24 this question and the second part's dealing with are 25 there any particular locations or siting strategies to

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1 maximize these health benefits?

2 And, Shana, I was wondering if you might have a 3 cut at this question?

4 MS. LAZEROW: Yes, thanks. Oh, did I turn this 5 off?

6 So, I think, as I said in my presentation, that 7 if you look at where the local capacity areas are in the 8 State and where the old OTC plants are, they tend to 9 kind of group over there along the coast.

10 And so in the current framework of -- you know,
11 and I have not actually projected out to 2030,
12 unfortunately, we'll have to rely over on Berkeley or
13 NREL to do those projections.

And, unfortunately, the pockets of really poor air quality and, also, lack of access to adequate health care, to adequate child care when your child is home from an asthma attack, the lost days of work are all very much concentrated over on the west side of that east/west divide.

So to the extent that you are able to reduce the operation of these older, more polluting plants on that side the public health benefits, I think, would have a much higher monetary value, which is not actually the perspective from which my organization approaches human impacts. But I realize that there's a value to

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quantifying it in terms of dollars and sense for, you
 know, people's lives and children's hospitalizations.

3 So, definitely I think that looking at targeting 4 the siting to reduce operation of the plants in these 5 already impacted communities has a great social benefit.

I think also there's a value to be had in
actually investing in communities in putting local hire
provisions into, say, feed-in tariffs that would target
communities.

10 And I realize that I'm transitioning back to 11 question one, which is what could be some of the drivers 12 for this. But you could have a very targeted feed-in 13 tariff policy that would provide an incentive for 14 installation specifically in targeted locations.

15 So that's one of the solutions that we're 16 looking at to see -- to trying to get some of these 17 benefits in low-income communities of color in 18 California.

19 COMMISSIONER PETERMAN: And if I may, following 20 up on Shana's point, because you mentioned benefits from 21 displacing, like you say, plants from the west side of 22 the State in Southern California, can Heather or Jimmy 23 speak to, in terms of their analysis, where the 24 expectation is around the renewables in the 33 percent, 25 and in your model, and just from our work? A lot of **CALIFORNIA REPORTING, LLC**

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1 it's in the desert, we know, and I'm thinking it's not 2 in the west part of the State, so I'm trying to see how 3 much disalignment there might be between where maybe the 4 health impact benefits would be versus where we're 5 siting it for other reasons.

6 MR. NELSON: I guess in our work you end up 7 retiring almost all of the old really nasty plants, and 8 the cost for moving a natural gas plant around is kind 9 of do you have transmission capacity or not.

10 So to the extent that you can build a little 11 more transmission and move a natural gas plant out of a 12 really, you know, highly populated area in the west, 13 then it might be worth it.

14 The solar kind of, yes, just in the east of the15 State.

MS. SANDERS: Okay, I'll do my best on this one.
We did a zonal analysis to -- for assumptions of
different renewable penetrations.

In light of your question, earlier, I did look up the amount of distributed generation that was assumed in solar PV, and each of the cases varied.

And in most of the cases it was between 1,000 and 2,500 megawatts of solar. However, we did do an environmentally constrained case that was 9,000

25 megawatts.

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There are also assumptions of additional
 combined heat and power.

3 In our studies we also included 7,000 megawatts
4 of energy efficiency savings and 2,500 megawatts of
5 additional demand response.

6 So what we want to say is that we are not 7 expecting all of the flexibility to come from natural 8 gas, but from other resources as well.

9 We did a high-load case just to make sure we 10 covered that bookend if energy efficiency didn't come in 11 at 7,000, but rather adding an additional 5,500 to look 12 at what that meant.

I just want to make one comment to like a feedin tariff, or something in a local capacity area. One thing that's really important in a local area is that generation has to be reliable.

And so if you're going to supply that from an uncertain or a variable resource, you need to be able to balance that locally.

20 So, I know we all know that, but if we think 21 about those incentives, we also need to think about 22 balancing that locally because of the constraint in 23 those areas.

24 COMMISSIONER PETERMAN: Well, thank you. I
25 think the local liability concern is one of the reasons
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why you're seeing, perhaps, this disconnect between
 where the displacement -- where we're displacing versus
 where we're building renewables.

MS. SANDERS: Oh, in all of our cases we didn't assume all of the retirements for OTC, we assumed some would be repowered. But I'd need to go look into the details of which case assumed which, retirements and repowering, I'd have to get those details.

9 COMMISSIONER PETERMAN: And that was my 10 understanding as well, that an amount will be repowered, 11 so that's something to keep in mind as we move forward 12 and think about expectations around health benefits and 13 such.

MR. LEON: Can I jump in with one comment related to this? You know, one thing, listening to this, that might be a useful exercise would be to say, look, here are the facilities that we think are the most polluting, that have the highest health impacts, and then just ask the question what is the cheapest way to qet those facilities offline.

21 And it may or may not be doing distributed 22 generation in those communities. It may be possible 23 that the way you get those offline is by some larger 24 facilities elsewhere, rather than small DG locally. It 25 may be DG locally, but just asking the question as how CALIFORNIA REPORTING, LLC

1 do we get the facilities offline at the lowest cost 2 might get you to some answers that you could be using in 3 setting policy.

MR. OLSON: I was going to tackle that one, too.
I mean you could almost take the question up to a higher
level than that, even, which is how can you reduce
emissions from those facilities?
So one way might be to repower them with cleaner
facilities that have, you know, more emission controls.

10 And, you know, this issue of which plants get 11 displaced, local versus regional, you know, we are on a 12 regional grid. And so everything that we do at one 13 location affects how the grid operates at every 14 location, really, in the west. It's one synchronous 15 machine for the entire west.

16 And this question is really -- it's really 17 complicated when you put a facility in one place of what 18 actually gets displaced.

19 And particularly in load areas that are 20 constrained, like the L.A. Basin, or like the Bay Area, 21 it's almost a separate question of when do we need to 22 operate the peakers versus what generation renewable is 23 displaced?

24 Because, really, for the most part I think we're 25 operating those peakers for local reliability needs, to CALIFORNIA REPORTING, LLC

meet the peak demand in that area and for transmission
 stability.

There needs to be a certain number of machines in an area spinning so that if there's a contingency on the grid that there's enough response so that the whole grid doesn't fall down and we have blackouts.

7 So that's sort of the reality of operations in 8 some of these areas. And that's why it may be that that 9 machine that's next door to you, it has to run during 10 that system. And it doesn't matter whether you're --11 you know, what your load is, whether you have your 12 lights on or not, or whether you have a PV panel or not, 13 just to serve the general need in that local area that 14 plant needs to run.

And so, you know, if you put a solar panel on your roof, that may be displacing a facility that's 50 miles away, or 100 miles away.

18 So I think we know, you know, generally that 19 renewables displace fossil fuel resources, they reduce 20 emissions generally.

I think it's another step to say from there, you know, which specific plants are reduced, what are the -how much are people's exposure to air pollution reduced because of that renewable resource. And then even another step to say what are the health impacts from CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 that.

2 CHAIRPERSON WEISENMILLER: Shana? 3 MS. LAZEROW: Yes, please. So I actually -thank you. I had a couple of comments, I think this 4 5 really highlights the question of what is our goal in, 6 you know, transitioning. There are many benefits, 7 right, so the reduction of air impacts from the old gas-8 fired fleet is one benefit. 9 Replacing them with new gas-fired power plants, 10 you know, having an electrical system that works is very 11 important to our community as we need our lights to turn 12 on and our hospitals to work. 13 But replacing that same plant with another plant that's going to operate for another 40, 50 years is not 14 going to meet all of those goals, it would only meet the 15 16 spinning reserves goal. 17 So, that's what this body that is -- this is one

17 So, that's what this body that is -- this is one 18 body that is supposed to be considering what these 19 benefits are.

I was over at the Public Utilities Commission yesterday, their energy staff was doing a workshop and we were actually talking about the different scenarios that we ran in the 2010 LTPP and talking about the inputs on those.

25 One of the things that the LTPP group was very **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 concerned to highlight was that the scenarios didn't 2 account for storage. So, and there was also a lot of 3 discussion about the results of the different scenarios 4 being very similar and kind of plain vanilla, which I 5 thought was interesting. It wasn't my point, but it was 6 one that came out of this workshop of people far smarter 7 than I am, who were hoping that the inputs the next time 8 around would really reflect some of this geographic and 9 other concerns.

10 So, I think that that working group is going to 11 be, obviously, operating at the same time as the IEPR 12 and coming out with yet more interesting, less plain 13 vanilla results.

14 COMMISSIONER PETERMAN: And I'll also add that, 15 you know, to your point, Shana, about goals. I mean the 16 RPS legislation has nine goals and pieces of intent in 17 it, and none of them are jobs or economic growth, right. 18 And so, you know, it's interesting the point 19 that it is true consistently what we've heard is a 20 demand for job opportunities. 21 And so, ultimately, we're never going to 22 optimize every single goal. 23 And what I'd like to do here and what we're 24 trying to do is since we're spending money, anyway, in

25 building this system can we get some more of those

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1 benefits? You know, not dismiss one at the sake of 2 another, but acknowledging that they all won't be 3 obtained at the maximum, but we've got an opportunity 4 now to do it more smartly. And if we can think about 5 how to reduce air pollution, especially in communities 6 that have suffered more, then let's see what that would 7 cost and what we'd have to do.

8 So, the point's well taken but I'll tell you
9 it's -- people want a lot of things.

10 MR. ALVARADO: Well, we're really getting into 11 the question about displacement. And, actually, I want 12 to touch on something that you mentioned, Arne.

This is a complicated question. We've got local reliability concerns, but you've indicated that whatever decisions or new additions in California also affects the dispatch in other regions, and possibly imports. I was wondering if you could expand on what you were saying about that?

MR. OLSON: Well, I think it goes back to the question of so if you generate a megawatt hour of renewables in a given location, what changes elsewhere in the grid?

23 One of the studies that we did a couple of years 24 ago, working for the ARB on the 33-percent RAS study, we 25 wanted to try to estimate that question and wanted to CALIFORNIA REPORTING, LLC

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try to estimate what's the reduction in criteria
 pollutant emissions in California as a result of moving
 to a 33-percent RAS, and that's an obvious benefit if
 you can reduce those emissions.

5 So, we started off with this idea that we would 6 take these wonderful tools that we have, these 7 production simulation models where you have, you know, 8 nearly every generator in the west represented, with 9 something like a relatively reasonable heat rate, and 10 the transmission constraints represented as well.

11 And go from that to plant-specific emission 12 factors so that we can really understand what exactly 13 happens when I put renewables in California.

14 And the first problem we had was that we couldn't line up the plants that were in the production 15 16 simulation model with the data that the ARB had and 17 it's -- you know, of emission factors that it had in its 18 database because it's just the names are different, you 19 know, the plants aren't specified exactly right in the 20 production model. We just -- we tried for a while to 21 get there and we really couldn't. So, it was a 22 limitation of the tools that we have available to us. 23 So we ended up using something more like generic 24 emission factors by type, you know, old versus new CT, 25 versus CCGT. And that gave us, I think, some really **CALIFORNIA REPORTING, LLC**

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interesting and reasonable answers from the perspective
 of the State of California.

3 It didn't really give us very interesting4 results at any level of geography that was below that.

5 And to this question of in-state versus out-of-6 state, those studies would seem to indicate that placing 7 renewables in California reduced generation on emissions 8 in California relative to other states on about a 50/50 9 basis. So, if we put renewables in California, we were 10 displacing half the gas plants in California and half 11 gas plants in other states.

Now, again, there's lots of limitations on those tools and I think if we -- in knowing what I know now about those tools, I think that probably overstates a little bit the amount of reduction. And in other states it probably does have more of an impact in California than that.

18 But it still is a caution that, you know, we are 19 on a regional grid and a regional system. And the unit 20 that's marginal, in other words the unit that moves when 21 you do something, might not be the one that you expect. 22 MR. ALVARADO: Part of the question is 23 displacement, but I think renewables also will provide 24 some benefit when we talk about replacing other 25 generation resources. So, we got into the discussion **CALIFORNIA REPORTING, LLC**

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about some of the once-through cooling plants, those
 will -- some of them may need to be replaced.

3 We're going to have a number of the coal 4 contracts that are probably going to expire, so I guess 5 our California utilities may need to procure some other 6 resources to replace those supplies.

7 Any comments about the notion about replacements 8 and the benefits?

9 MS. SANDERS: So when we think about displacing 10 other generation and counting renewable resources as 11 resource adequacy, that's leaving fewer plants available 12 with flexible capacity.

13 The other thing that's happening, that we need 14 to really keep in mind, is that the renewables will 15 likely, as the studies show, reduce the marginal cost in 16 the price.

17 And so there's going to be challenges in revenue 18 sufficiency for those flexible type resources as we go 19 forward. So that is something that we need to really 20 think about and our need for, you know, flexible 21 resources to balance and manage the uncertainty. So, I 22 just want to bring that up as part of the replacement. 23 MR. OLSON: You know, maybe I can summarize 24 this, generally. I think where we're at is that we can 25 very easily look at and see renewables as a way to **CALIFORNIA REPORTING, LLC**

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displace fuel use. And that I think is pretty -- it's
 pretty well understood that it does that, it displaces
 CO2 emissions, it displaces purchases of fossil fuel,
 and it displaces criteria pollutant emissions.

5 I think the jury is still out on how much it 6 saves in terms of other benefits, like capacity, or 7 transmission and distribution savings.

8 And Warren made the point earlier, very well I 9 thought, that we can say in theory renewables should 10 reduce capacity needs, and they should reduce the need 11 to invest in new transmission and distribution 12 investments.

13 But the geography of the electric system is very specific. A plant that's located in one area might 14 cause a transmission addition to occur, whereas one 15 16 that's 50 miles away, or 100 miles away, that's on a different corridor might actually prevent or, you know, 17 18 displace an investment from occurring that would 19 otherwise have occurred. So it's very, very specific. 20 And, you know, in terms of capacity, I don't 21 think we know, yet -- you know, we don't have 22 renewables, yet, that are widely available that can 23 displace the services that flexible generators provide 24 in terms of integration and in terms of being there, and 25 being reliable, and being available when you need them. **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 Photovoltaics don't have that characteristic or 2 that ability, yet. Some of the solar thermal resources 3 would. Those are spinning machines that do have inertia 4 that if you can do a little bit of gas and, say, a 5 little bit of storage, could be much more dispatchable. 6 But those resources are, themselves, going to be 7 very constrained in terms of where they can locate, just 8 in terms of environmental impacts, and in terms of 9 costs, and in terms of the resource quality that's 10 needed to support that type of an investment. 11 So, I don't think we're to the point, yet, where 12 we can really think of renewables as truly a substitute 13 for some of the gas-fired, and flexible, and locally-14 sited resources that we still are and will rely on. 15 If I can make a comment about that MR. LEON: 16 issue of transmission and distribution, when I was 17 directing the Renewable Energy Trust in Massachusetts, 18 we did a project to try to get utilities to defer 19 distribution upgrades because of the implementation of 20 distributed generation, and we found it was really hard. 21 But the way it worked was to sit down with the 22 utility company, on a sort of feed-a-line-by-feed-a-line 23 basis and go over their schedule of where they were 24 predicting they were going to have to make upgrades. 25 And there was some that they said, hey, we're **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 going to have to make an upgrade in the next two years 2 on this line and there's nothing you can do fast enough 3 to make a difference.

But there were some we could identify where they said, hey if you could guarantee X amount of distributed generation in this neighborhood, that means we could avoid having to make that distribution system upgrade in this area.

9 But it would involve a real partnership between 10 the CEC and the utilities to identify specific locations 11 and to then guarantee in some way that you were going to 12 give the amount of distributed generation needed so that 13 they could stop their planning for upgrades in that 14 particular location.

15 COMMISSIONER PETERMAN: I think that's a good 16 observation that there are some benefits that are 17 automatic, and then there are some benefits that also 18 require some stakeholder action to make them come to 19 pass, and that's something for us to give some thought 20 to.

And to your point earlier, Arne, I like to think about renewables plus what displacing gas plants, and I think that's where we need to take the conversation, and otherwise make a call and we'll talk about this in the retail rate impact and cost workshop a bit.

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1 But looking at the all-in costs of what that 2 substitute product needs to be, and not just focusing on 3 the renewable component, but adding integration 4 component as well, and seeing if you can get that unit 5 to be cost competitive. 6 Al, back to you. 7 MR. ALVARADO: Well, I was just reminded that 8 we're coming close to the allocated time and there is 9 quite a few other -- there's several other panels that 10 we want to discuss. And we've barely just even

11 scratched half of these questions, let alone drill in 12 much deeper.

I mean I could have a lot of questions. Ben, I would have liked to have quizzed you more about the actual values that you placed on some of the health benefits.

Maggie, I really -- I haven't had a chance to sort of pick on you but, you know, you brought up some issues about uncertainty, also.

In Suzanne's comment, she did remind me to encourage each of you, if you could please file comments, more detailed comments in response to these questions, I think it would be very important to feed to the record of the workshop.

25 COMMISSIONER PETERMAN: And, Al, if I may, I'm CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 going to put the panel quickly on the spot, and that 2 forewarns all the panels to come up. And if you don't 3 have an answer now, you don't have to give it. But if 4 you were to throw out one recommendation related to this 5 issue, that the Energy Commission should consider or the 6 other stakeholders should consider what is it? And it 7 can be as crazy or as boring as you want it to be.

8 MR. ALVARADO: Maggie.

9 MS. MANN: Well, I don't know if this would be 10 my one recommendation, right, you know, how can I come 11 up with one, but I think that --

12 COMMISSIONER PETERMAN: Your first, how about 13 your first recommendation? We'll say it and that puts 14 everyone off the hook.

MS. MANN: The first that comes to mind. The first one that popped to mind is that we haven't really discussed here the integration of the transportation and electric sector.

And I think with the very, very quickening evolution of the electric and hybrid-electric plug-in vehicles, and the reduction in cost, and everything that's going on with that is that in your dialogue about how to take into account the benefits of renewables, and how to deploy more renewables in the State to not exclude the transportation sector. Because that could

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really change the way we look at how electricity is
 deployed.

3 MR. MACHOL: And I would say, I think I already 4 said this, but I'll take this opportunity to say it 5 again, but just to encourage you to consider a health 6 adder that would allow you to fully account for the 7 differences between energy alternatives.

8 MS. LAZEROW: I would absolutely second what Ben 9 said and consider that adder might well be used to 10 offset something like a feed-in tariff that would 11 provide an economic driver to encourage renewables.

MS. SANDERS: From our perspective it always comes back to flexible capacity and the ability to balance these renewables, especially locally. So, if you're talking about distributed generation and if it's PV, it doesn't solve the problem on its own.

So, you know, the consideration of flexiblecapacity in local areas.

MR. LEON: I would say my one recommendation is what I said before of trying to develop the list of what are the things you already -- or someone already knows with a high degree of confidence, and what are a few things that you need answers to in the short term, that you can get answers to relatively easily with additional studies and just focus on those few questions.

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1 MR. NELSON: So, I guess my recommendation 2 pertains to national security people a lot of times get 3 the idea that moving to clean electricity gets us more nationally secure. And that's not really the case 4 5 because all the fuels are produced domestically. 6 But getting to Margaret's point, if we electrify transportation it actually has the co-benefit of 7 8 reducing our dependence on oil. And, you know, that has 9 other benefits, like reducing our dependence on oil 10 price shocks, as well, not just the national security 11 benefits. 12 MS. MANN: And if I can just add to that, there 13 are benefits with the electrification of transportation 14 on things like health. 15 MR. OLSON: I think my recommendation may seem 16 like it's going to come a little bit out of left field 17 because it's not going to be related to anything I've

18 said previous on this panel.

But my -- and I think some of this work is 19 20 already going on, but my recommendation would be to 21 identify those locations where you have that 22 intersection of high quality renewable resources and 23 land that is either already degraded, or sort of not 24 pristine, not of high environmental value. That seems 25 to me to be the highest priority target for where we **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 should be targeting location of renewable resources.

I think that's an easier benefit for us to grasp and to quantify than, you know, trying to quantify a local emission benefit.

5 MR. MACHOL: You know, on that note we're 6 working with NREL and we're mapping degraded lands 7 across California, fallow ag lands, and there's 10,000 8 plus in the State. So, we're looking at that map 9 compared to renewable resources and certainly want to 10 utilize that as much as possible.

11 COMMISSIONER PETERMAN: Great, thank you. Al, 12 any recommendations?

13 MR. ALVARADO: Well, I'm more of the systems 14 person and I'm very interested in terms of, you know, we 15 didn't get into a discussion about tools but, you know, ultimately not only our agency, but with input from 16 17 everyone else I do think, you know, that something 18 similar to maybe, Jimmy, what you've done of doing a 19 total system type analysis, Arne, or even the ISO 20 dealing with some of the systems reliability aspects.

I think that would be one step in the direction towards trying to identify how best to maximize the benefits of any of the renewables.

24 With that --

25 COMMISSIONER PETERMAN: Well, with that, thank

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1 you, great job moderating. Thank you to all the 2 panelists, that was very interesting. Any additional 3 comments you want to provide, written or otherwise, 4 please do. 5 And all the topics raised here today feed into 6 the six other workshops we have planned. So, if you 7 liked this panel, stay tuned for the next 30. 8 MS. KOROSEC: All right, if we can ask the 9 members of the Panel Two and the moderator to join us up 10 at the table, please. 11 We'll be starting in just a moment, when 12 Commissioner Peterman returns. 13 MR. O'NEILL: All right, everybody, we're going 14 to go ahead and get started. 15 My name is Gary O'Neill, with the Renewable 16 Energy Office. This is the second panel of the day, 17 we're going to try to wrap up at 12:30 so everybody can 18 qo off to lunch. 19 On this panel we'll be discussing the State and 20 local policies and programs to capture the public 21 benefits of renewable energy. 22 State and local agencies are charged with 23 balancing the land and natural resources with the 24 impacts of their use to their citizens, neighboring 25 citizens, and the environment. **CALIFORNIA REPORTING, LLC**

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1 Through this panel we would like to identify and 2 explore the various renewable energy technologies, the 3 benefits that influence policy decisions at these 4 agencies and what your agency sees as the resources and 5 benefits that complement your charge. 6 We'd like to also discuss what the challenges 7 are to realizing these renewable energy benefits on the 8 ground and what needs to be done to overcome these 9 challenges. 10 With that I'm going to go ahead and turn it 11 over, I'm going to ask each one of you to provide a 12 five-minute, brief introduction. 13 And we'll go ahead and start with Steve, the 14 California Air Resources Board. 15 MR. CLIFF: Thank you. Good morning, I'm Steve 16 Cliff; I'm Chief of the Climate Change Program 17 Evaluation Branch at the California Air Resources Board. 18 And I'm here today to discuss renewables in the 19 context of the greenhouse gas cap and trade program. 20 The Cap and Trade Program works by establishing 21 a firm cap on emissions, which is a strict limit on 22 emissions, on greenhouse gas emissions from all covered 23 sources. 24 The cap declines each year, which ensures that 25 reductions in greenhouse gas emissions are achieved. **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 It's important to note that no facility-specific 2 requirement to reduce emissions under the program, nor 3 is there a limit on the emissions from any single 4 entity.

5 In the first phase of the program covered 6 entities will include any stationery source of 7 greenhouse gas emissions at or above 25,000 metric tons 8 of carbon dioxide equivalent annually.

9 These sources include the State's largest 10 emitters, such as power plants, refineries, cement 11 plants, and crude petroleum production.

12 Imported electricity is also covered in the 13 first phase.

In 2015 fuel providers, such as natural gas utilities, and distributers of gasoline and diesel fuel are added to the list of covered entities, and they must account for the fuel that they sell for consumption in California.

Because the cap and trade program causes dirty energy to cost more, clean energy, such as that from renewables is incentivized.

The regulations has mechanisms to ensure the incentive for clean electricity delivered to the California grid is recognized when it avoids greenhouse gas emissions in the generation of that electricity.

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The cap is in force with tradable allowances,
 where each allowance equals one metric ton of greenhouse
 gases.

4 Those covered by the program submit the 5 allowances to the State in an amount equal to their 6 greenhouse gas emissions during each phase of the 7 program.

8 Entities can trade these allowances among each 9 other, which enables them to find the least expensive 10 reductions and comply in a manner that makes the most 11 sense for them.

Each year, ARB will issue allowances directly. Initially, we allocate allowances for free to industrial producers to make sure they can remain competitive in a global marketplace and to ease the transition into the program.

We also provide allowances for free to utilities
to protect electricity ratepayers from program costs.
Some allowances are set aside in a reserve
account to protect against the potential for high
prices.

The remaining allowances go to auction, where the money from auction can be used by the State to pay for emission reducing measures consistent with AB 32. We estimate the potential proceeds to the State,

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from the auction of allowances, in the range of \$16
 billion to \$70 billion in total between now and 2020.
 We've estimated nearly \$1 billion will be available in
 fiscal year 2012 through 2013.

5 ARB will be holding a workshop in the near 6 future to discuss potential uses for revenue generated 7 from the auction of allowances and, ultimately, the 8 appropriation of these funds will be determined in the 9 budget process.

Imported electricity to meet the RPS standard is recognized by the program by allowing an adjustment to an importer's compliance obligation for that energy.

Likewise, zero emitting, renewable energy
generated in California avoids a compliance obligation
altogether.

16 Renewable electricity is incentivized because it 17 has no carbon cost for its generation, but competes with 18 greenhouse gas-emitting electricity that will face these 19 costs.

20 The Cap and Trade Program also incentivizes 21 biomass-derived energy by exempting emissions from 22 verified biomass from a compliance obligation.

In addition, reduction of methane emissions to the atmosphere, that are quantified using ARB-approved protocols may also generate offset credits, which can be CALIFORNIA REPORTING, LLC

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used by an entity for a portion of their compliance
 obligation.

3 Lastly, we recognize that once the Cap and Trade 4 Program is in place voluntary renewable electricity 5 production no longer reduces emissions overall. 6 For this reason we have rules in the regulation to retire some allowances to account for voluntary 7 8 renewables so that they may continue to reduce 9 greenhouse gas emissions. 10 Thank you. 11 COMMISSIONER PETERMAN: A quick question for 12 you, Steve. You mentioned a couple of the ways in which 13 the Cap and Trade Program incentivizes bioenergy and 14 methane reduction, are there any geographic factors 15 considered or variation in the implied incentive, based 16 on geography? 17 MR. CLIFF: For renewable electricity --18 COMMISSIONER PETERMAN: Right. 19 MR. CLIFF: -- that's delivered to the grid, no. 20 Essentially, if that renewable electricity is to meet 21 the RPS obligation, then that can be netted out from an 22 obligation for those who import. 23 Likewise, if it doesn't emit in the generation 24 of electricity in-state, there's essentially nothing to 25 report and, therefore, there's no compliance obligation, **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 so in that way, no.

2	If, for example, you had renewable energy that
3	isn't to meet the RPS obligation, that wouldn't avoid a
4	compliance obligation. Nevertheless, that also wouldn't
5	be electricity that's reported to California that would
6	be essentially out of the WECC.
7	COMMISSIONER PETERMAN: I see. One of the
8	issues raised in the first panel is just that even with,
9	say, something like biomass the environmental benefits
10	could vary across the State due to location.
11	And so it seems like, at least with the approach
12	so far, that there's acknowledgement of the value of the
13	biomass, for example, but that's not differentiated
14	based on location within the State.
15	MR. CLIFF: That's right. For cap and trade
16	it's really a statewide look. Cap and trade's really
17	meant to complement other policies.
18	COMMISSIONER PETERMAN: Right.
19	MR. CLIFF: So to the extent that other policies
20	would restrict a particular type of source of
21	electricity in a given region then, you know, that would
22	be fine for cap and trade because we're looking at
23	emissions, not reductions.
24	COMMISSIONER PETERMAN: Thank you.
25	MR. HOUSTON: This is Jim Houston with the
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California Department of Food and Agriculture and the
 Deputy Secretary for Legislation and Public Engagement.

3 Our department is a little short on authority in4 this area, but we are long in enthusiasm and energy.

And so what -- you know, we do have a couple things that we're trying to do, and what the Secretary likes to say is, you know, we can always convene meetings.

9 So, the sort of primary function that we serve 10 right now is the Fed/State Task Force on Digesters. So 11 for the past year we've been heavily engaged with both 12 the Federal government and regional air districts in 13 trying to find ways to get more digesters in the State. 14 As many of you know, the ratio of digesters to cows in California is significantly lower than it is in 15 16 pretty much any other state. Wisconsin, primarily, is 17 significantly far ahead, so we're trying to rectify 18 that.

19 I mean we do face much more significant 20 challenges, specifically air quality, than Wisconsin 21 does, which have impeded our progress, but we are 22 undaunted.

23 So, one of the things that we've been focused on 24 in that is really this question of trying to quantify 25 the benefits of biomass, specifically.

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You know, from our perspective one of the really
 neat things about biomass is that it does have these
 benefits on a local scale.

You know, solar and wind are very valuable but
their benefits primarily come from displacement of
fossil fuel. There's nothing inherently beneficial
about having a solar facility on a plot of land.

8 What digesters attempt to do, and I understand 9 there are some concerns with the whole internal 10 combustion aspect of biomass, but it takes an existing 11 externality and harnesses that to, you know, displace 12 fossil fuel burning somewhere else.

13 So there are some local benefits that come from, 14 you know, utilizing that waste, not trucking that to a 15 landfill, not burning it on a field, which is much more 16 difficult now than it used to be, obviously. And you 17 have water quality benefits.

But on the flip side, it's much more difficult to quantify those benefits because, you know, air -- air benefits have been widely studied and understanding the displacement of greenhouse gas, something we're very well steeped in.

But understanding soil and water quality
improvements take a lot more resources. And due to our
budget situation, our resources are low. But as I said,
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1 we can convene meetings.

2 And we're currently working with our Federal 3 partners and State partners to try and get projects off 4 the ground, in the Central Valley, that will look at 5 these benefits, quantify them and, hopefully, utilize 6 that to either, you know, drive policy in the Legislature, here at the CEC, or the PUC so that 7 8 policymakers can have real numbers that they can use to 9 make decisions, as opposed to speculation. 10 I mean we -- you know, I think we're in that 11 third category of, you know, we need a little bit 12 further analysis. 13 COMMISSIONER PETERMAN: I was just thinking 14 that, actually, that's what I whispered to Jim over 15 here, on my left. 16 MR. HOUSTON: Yeah, I thought that that 17 framework was very helpful. So, I think that's what 18 we're trying to do right now, so look forward to 19 discussion. Thank you. 20 MS. SANDERS: Hi, this is Heather Sanders with 21 the California ISO. From this perspective, again, I 22 would point back to the ISO's role in renewables and 23 it's really about reliability, and reliably integrating 24 as much renewable generation as we can.

25 So, in the development of our markets, in the CALIFORNIA REPORTING, LLC

1 design and policy around our markets we are really 2 looking to incent additional resources, other than just 3 conventional generators to come in and provide the flexible capacity that I continue to talk about in 4 5 reference in our markets, including demand response, 6 energy storage, virtual power plants, which is a combination of generation, demand response, energy 7 8 storage, fuel cells, and so forth to provide resources 9 into our market.

10 So our policies are really around, you know, how 11 can we integrate these renewables most reliably in this 12 system, how do we minimize the cost of those?

How do we enable additional resources to provide the flexible capacity that we'll need based on the renewable generation that's coming into our market.

16 So, I don't have a lot more to add. As I 17 outlined the studies we're already looking at to ensure 18 that we can incorporate these renewables. And, again, 19 as I'm substituting for Mark Rothleder, I'll do the best 20 I can to answer the questions of the panel. Thank you. 21 COMMISSIONER PETERMAN: Well, acknowledging that 22 you're substituting and doing double duty, because this 23 is your second panel, and I imagine you might be on all

24 of them, it's always good to have ISO at the table.

25 One thing to think about, following up on Jim CALIFORNIA REPORTING, LLC

Houston's comments, so they're working with digesters
 and trying to look for opportunities there in terms of a
 base load biogas.

And in terms of flexibility and the needs of the ISO, is there a minimum aggregated, you know, megawatt quantity of resources we need to have it be flexible. So we've got, perhaps, a couple kilowatts in some of these systems, or less than one megawatt. You know, how are you thinking about biogas resources in general to meet that need?

MS. SANDERS: Okay. Well, not specific to biogas, but to expand a little bit more on flexible capacity needs, what we're working on right now in the framework of the CPUC's Resource Adequacy proceeding and the Long-Term Procurement Planning proceeding is to define what flexible capacity means.

We've defined three general categories. One is maximum continuous ramping and what that means is what is the capability that we need of a fleet to

20 continuously ramp up to meet the load.

21 And from last year's data we need -- in August 22 we had a continuous ramping up, meaning the energy we 23 needed to supply the net load, load minus wind, minus 24 solar occurred over an 11-hour time period of over 25 18,000 megawatts. So, the ramp rate of that was 27 CALIFORNIA REPORTING, LLC

1 megawatts per minute.

The second category that we need, from a flexible capacity perspective, is load following. And load following is when you get into that inter-hour time frame and you're balancing the uncertainty relating to the renewables that come onto the system, you know, what's the maximum amount you need to be able to recover in that inter-hour period?

9 And setting last year's actual numbers, because 10 that's what we have, with the amount of renewables we 11 have on the system it was about 4,500 megawatts. And it 12 was in December. We like our Christmas lights in 13 California, so we need to be able to handle that maximum 14 ramping.

And then the third category of flexibility's about regulation. That's our four-second ability to maintain our ACE, our area control area and maintain frequency within the State of California. And that's much faster. I can't remember the numbers off the top of my head, but it's a much faster resource.

So in terms of flexible capacity, we're working to find how many megawatts we need by month because it depends, you know, on how much wind, and solar and uncertainty your net load is over the different months, and so we've defined that.

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Now, in terms of a base load resource, it
 depends on its dispatchability, its ability to come up
 when it's needed, how fast it comes up and then also
 come off when it's needed.

5 And that's one of the things we have trouble 6 with right now, in over-generation situations, is that 7 when the wind is blowing very, very hard at night, which 8 it does, and we have every base load generation on its 9 minimum, there's nowhere to go.

So, the ability of some resources to come off,as well, is also important.

12 COMMISSIONER PETERMAN: Thank you. I think 13 you've hit on the key point. Yeah, we talk a lot about 14 the actual resources, solar, wind, or digester gas, but 15 for your purposes the technology that they're running 16 through is going to be key into fitting into one of 17 those categories.

MS. SANDERS: Yeah, and I think that's really important from the ISO perspective. Our market policy and our market design really attempts to be resource agnostic because we have different needs that we're trying to define, and the resources should be able to come to market on an equal footing based on their capabilities.

COMMISSIONER PETERMAN: Thank you.

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1 MR. O'NEILL: Thank you, Heather. 2 Tim, please. 3 MR. SNELLINGS: Okay. Hi, good morning, Tim 4 Snellings with Butte County. Good morning, 5 Commissioners. 6 Well, Butte County, everybody knows where that is, 70 miles north of Sacramento, and we were actually 7 8 one of the early adopters of solar, putting in a one-9 megawatt PV system about eight years ago to help our 10 government center meet its energy needs. 11 Just this last summer Butte College announced 12 that it was the first grid positive college in the 13 country. 14 So, there's a lot of energy and enthusiasm about 15 energy, renewable energy in Northern California, so just wanted to put that right out there. 16 17 I'm also the President of the California County 18 Planning Directors Association and in that role I 19 represent 58 California County Planning Directors. 20 And our mission really is to facilitate best 21 practices around California counties and to make sure we 22 don't go about reinventing the wheel. 23 So, when somebody identifies a process that is 24 working in local government, we want to utilize that 25 throughout California and create some consistency and **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417
1 standardization.

There are two phases of local regulation at cities and counties that I want to just make sure we all understand, I guess, because a lot of reference is made to "regulatory problems."

And the two processes are -- the first question is, is the proposed use allowed on the land? And this is known as the land use process or also called the planning process, so that's the entitlement stage.

10 The second process is if the answer is yes to 11 that question then we move into the building permit 12 process, which we also refer to as the building permit 13 process.

People complain, though, about regulatory issues. And so I always ask them, well, what are you referring to, are you referring to the planning process or the building process? Because they each have their own challenges and hurdles.

19 So, let's just talk about the planning process 20 for a second. About a year ago I surveyed our 21 membership and asked them some questions about what size 22 of solar PV projects are allowed by right in their 23 jurisdictions, what size need use permits, what are the 24 rules for proposed PV on ag land, how are they 25 addressing Williamson Act contracts, which is our 26 CALIFORNIA REPORTING, LLC

Farmland Preservation Program in California that
 protects millions of acres of conversion to non-ag uses
 in exchange for tax relief.

And found out that around California there were a lot of different answers; that people were either doing it differently in their counties, across county lines, or they didn't have rules and regulations in their zoning codes at all, that general plan policies put nothing on the really -- the implementation side. So in short, we convened a lot of people around

California, about 80 people, the Governor's Office,
Planning and Research was helpful, the CEC was helpful,
CSAC, League of Cities, Solar Industry, and we had over
80 people help us draft what we -- what came to be known
as the Model Solar Energy Facility Permit Streamlining
Ordinance.

And I thought it would be done in four meetings, it took 15 meetings. So, on February 3rd, the California County Planning Directors adopted this. And really what it does is it creates a framework for each county to consider how to utilize this model ordinance for their own local adoption.

And if you go to the next slide, I'll show you one of the key things. Everybody can read this okay, everybody understands it, no questions?

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1 This is actually very helpful to a planning 2 department in California. And what this does is this 3 sets thresholds for how we process projects. And 4 through this process we invented four tiers of 5 permitting. And the lowest tier, tier one, is for 6 rooftop solar or up to half-acre ground-mounted solar.

7 And, you know, that's the low-hanging fruit that 8 we all talk about. Every place that can have rooftop 9 solar, we should make it as easy as possible in a city 10 and county to accomplish in California, and that's 11 really just going through a building permit process.

12 And, you know, in Butte County we issue those 13 kind of permits online and on our website 24/7. And so 14 there's a lot of encouragement around California to do 15 just that in cities and counties, to make tier one 16 permits easy to install, whether it's commercial or 17 residential rooftops.

18 Tier two is -- and this is where we spent 19 probably the most of our debate and discussion in these 20 meetings was allowing a process, we have an 21 administrative process in counties, and it's really 22 where there are standards that if you meet these 23 standards -- it's very similar to administerial permit, 24 a building permit -- if you meet these standards, we'll 25 issue you a permit.

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1 And so the question is what's the threshold that 2 we can go up to without trigging CEQA? And we 3 identified, and that's what that table really seeks to 4 address, where all -- where you see all those APs, we 5 identified up to 15 -- up to five acres or 15 percent of 6 solar PV on even prime farmland would be allowed with 7 just a building permit, through an administrative 8 process.

9 And we had the Farm Bureau, and Large Scale 10 Solar, and we went at it pretty good and debated, and 11 this was the compromise that was settled on.

12 And so this tier two is a very important part of 13 the distributed generation strategy. And this allows a 14 farm to have some solar PV to offset whether it's pump 15 usage, or some commercial farm operations they may have 16 on site, refrigeration, things like that.

17 Tier three is kind of interesting because it 18 triggers CEQA, but through a lower level hearing 19 process. Typically, in most counties, we have an 20 administrative hearing office, known as a zoning 21 administrator, and that's a more streamlined process 22 where we think the answer's yes, we use that process, 23 and so we think there's not as much controversy. 24 And so we identified a threshold and, really,

25 this is up to 30 acres of non-prime ag land is where

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1 this minor use permit process, through a zoning 2 administrator, is recommended to be used. 3 And then above that is what we call tier four, 4 and that's where you get into full-blown use permits, 5 CEQA, all the issues of visual impacts, ag, the 6 Williamson Act, decommissioning, all of those issues are 7 going to be addressed on the larger-scale projects. 8 And so I think the main thing I wanted to just 9 introduce with is the accomplishment of this and the 10 partnership that we utilized to create this. It was a 11 real spirit of compromise. 12 And the important role that local government 13 plays in this discussion, all of these rules and laws 14 are going to be implemented locally, for the most part, 15 unless it's State or Federal land. 16 And so with 500 cities and 58 counties, we need 17 to really coordinate, and I think partnership is the key 18 between State and local, and I think there is a 19 framework that's been established to do just that. 20 Thanks. 21 COMMISSIONER PETERMAN: Well, congratulations 22 on, first, getting that much collaboration amongst the 23 counties and getting a standardized ordinance out there, 24 something I'm very glad to hear about. 25 And in the discussions you've been having has **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 there been discussion about perhaps allowing faster
2 permitting for projects that provide certain local
3 benefits or other environmental benefits?

4 MR. SNELLINGS: It's all about speed in 5 counties. And on the economic development front that we 6 heard talked about, it's all about location, too.

And one of the strategies we came up with is the idea of creating an overlay, a renewable energy overlay and that would be an area that we could -- if we had funding in cities and counties we would study this area, it would be a kind of a subset of a general plan that would be the prime locations.

We heard one of the early panel members talk about, you know, the areas where you're on marginal farmlands, brown fields, other non-prime soils, and you're also close to transmission lines or substations with capacity. We want to find those locations and then make it as easy as possible.

19And if we did some advanced planning work we20would be able to facilitate a more streamlined process.

21 COMMISSIONER PETERMAN: And also, have there 22 been any discussions about more model permitting 23 procedures for some of the bioenergy projects?

24 MR. SNELLINGS: I think the next area we're

25 tacking is wind. And I think there's enough information

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1 out there that probably what we'll do is pull together 2 best practices around California, and we'll convene a 3 group of people, also, to review that and make sure 4 we're on target. 5 COMMISSIONER PETERMAN: Thank you. 6 MR. O'NEILL: Thank you. MR. SNYDER: Hello Commissioners, Bill Snyder 7 8 with the Department of Forestry and Fire Protection. 9 I'm the Deputy Director for the Resource Management 10 Program areas. 11 I'm here today, I think basically, from our 12 perspective our role in this is several, it's kind of 13 like looking at a four-legged stool, if you will. 14 Certainly, we're directed in the Public Resources Code to provide for facilitation of energy 15 production using biomass resources, and that 16 17 facilitation comes in a number of forms. 18 The second leg of that stool is looking at our 19 assessment responsibilities where we are required, by 20 the Public Resources Code, to assess resources 21 statewide, some of which include biomass resources and 22 bioenergy production. 23 The third piece of this comes through our regulatory role relative to commercialization of biomass 24 25 and removal of biomass from forest lands within the **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 State.

And the fourth and probably biggest issue that we have an interest with is respect to fire protection and the threat that some of these extraordinarily high levels of biomass on these forested landscapes pose to communities.

7 I have provided a copy of a number of things for 8 your reference, which include just an overall assessment 9 on the importance of biomass and biomass removal, as 10 well as some products from our Forest and Resources 11 Assessment Program, or Fire and Resources Assessment 12 Program that looks at the biomass resources.

And I think one of the things as you look at that then are some chapters there relative to the emerging markets and where those locational opportunities might reside relative to potential

17 utilization for woody biomass.

As we look at things currently, there is a lot of fuel reduction work that is going on. Unfortunately, while the Forest Service is currently doing 100,000 acres a year and the department is doing up to 15,000 acres a year, there's not a lot of that, that economically can be moved off those sites, and moved to woody biomass plants.

25 Recognizing that that is an issue, I think we've CALIFORNIA REPORTING, LLC

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been working closely with a number of folks, Placer
 County, to look at what we might be able to do to look
 at economics associated with that.

We know currently we have about 800,000 bone-dry tons of woody biomass that are used for energy production in California. We also know that there's probably an untapped potential of another 2.8 million bone-dry tons, annually, that could be brought into the market.

10 So there are a lot of potential there, but there 11 are some significant challenges. And I think, you know, 12 as we look at the challenges there's certainly 13 uncertainty over the future energy prices, which affect 14 biomass value.

And biomass production and kilowatt production generally with biomass is higher than other forms of energy production. So that's a significant hurdle to us, currently.

Certainly, there are some uncertainties
regarding supply, particularly from public lands
relative to biomass.

There's opposition to siting of new biomass facilities. We have permitting barriers, certainly in terms of just the cost and time to get through permitting hurdles.

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1 And then there are public concerns regarding 2 impacts and sustainability of the biomass harvesting on 3 forested landscapes.

As we looked at the process through our 2010 assessment, we found that of the areas, and communities, and landscapes that are threatened by high levels of biomass and could benefit from some biomass treatment, only about 22 percent of those currently lie within a reasonable distance of a woody biomass plant in order to facilitate getting some of that treatment done.

We also looked at what benefit there would be at a little higher value for the kilowatt production and estimated that every one cent of kilowatt value could provide an additional \$10 per ton that would assist in the delivery of biomass to biomass plants.

16 So there's a lot of potential there and I think 17 as we look at some of the existing facilities, look at 18 some of those that we know have made applications, as 19 well as look at the potential for small distributed 20 facilities that are looking at technologies using 21 combined heat and power, there's a lot of potential 22 there, it's just how to get to it.

23 So I think I'll probably stop now. In your 24 document you have a PowerPoint that basically shows and 25 quantifies some of the biomass resources and shows some CALIFORNIA REPORTING, LLC

of the locational issues that you are looking at. And,
 clearly, biomass potential really resides primarily in
 the northern part of the State and is associated with
 forested resources.

5 There's a lot of mapping and it will show you 6 what we were looking at in terms of evaluations on 7 wildfire threats to communities, as well as wildfire 8 threats to forested landscape, and forest health.

9 And based upon those we made some projects of 10 total acres that would need to be treated.

11 You should also have two excerpts from the 2010 12 Fire and Resource Assessment. One that talks about 13 emerging products and services, one of which is woody 14 biomass and then the second part is the strategy in 15 terms of how we anticipate going forward and dealing 16 with continuing to facilitate looking at market 17 development and utilization of this resource.

And then, within that you also have some tools that we have been able to use in terms of looking at wildfire behavior modeling in terms of the benefits of removing biomass and reducing fuel loads on acres from any consistent perspective.

And then there's also an article that deals withbiomass use in feed stock issues.

25 With that, I'll stop at the correct point in

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1 time.

2 COMMISSIONER PETERMAN: Bill, these are great. 3 I'm glad I have a copy. I hope that you will submit 4 them to our docket as comments so that others can 5 receive them, as well.

6 And when you were talking about fire protection, 7 I was just thinking about all of the other benefits that 8 come from reducing the fires in terms of air pollution 9 benefits, and even system reliability, potentially, when 10 we think about some of the effects we've seen fires have 11 on the grid.

But then you've also pointed out that most of 12 13 the potential is in the northern part of the State. And 14 so I was just thinking about, you know, how much alignment is there between the parts of the State that 15 16 suffer from some significant fires for various types 17 of -- from various types of woody waste versus where you 18 see the biomass potential? And if we were better to 19 align that, what would that cost? 20 MR. SNELLINGS: Well, I think, clearly, the 21 communities in the northern part of the State are 22 sitting on a tinderbox relative to the forested 23 conditions. There are high fuel load levels. 24 I think overlaid with that is a changing climate 25 condition where we're recognizing longer summers, hotter **CALIFORNIA REPORTING, LLC**

summers. The potential for wildfires affecting those
 communities directly is only going to increase as time
 goes on.

4	So I think locationally woody biomass and
5	utilization that woody biomass would provide a number of
6	benefits, not only from a fuel reduction and community
7	safety perspective, but looking at a landscape health
8	and ecosystem resilience perspective. Removing some of
9	that excess biomass will benefit the remaining
10	vegetation and make it more resilient to changes, and
11	climate changes, and precipitation patterns, and other
12	pieces of it. So, you know, there are a lot of
13	significant benefits to it.
14	You know, the difficulty is how to quantify
15	those benefits and then basically monetize them, which
16	has been a challenge for us all along.
17	COMMISSIONER PETERMAN: Thank you.
18	MR. O'NEILL: Thank you, Bill.
19	Before we move on to Steve Weissman, I'm told
20	that somebody from the U.S. Forest Service is here.
21	We'd like to invite them to join us at the panel, if
22	they'd like.
23	And while we're waiting, we'll move on to Steve
24	Weissman.
25	MR. WEISSMAN: Good morning, Commissioners, I'm
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Steve Weissman, I teach energy law at UC Berkeley Law
 School and director the energy program in the Center for
 Law, Energy and the Environment.

4 One of the activities we've been involved with 5 for the last year has been to assist the Governor's 6 Office in his effort to promote his 12,000 megawatts of 7 local renewables policy.

8 We helped him put on a conference last summer 9 that many of you attended, and now have been working on 10 a report based on that conference to try and identify 11 barriers and solutions.

12 We issued a draft report about six weeks ago, 13 received over 30 sets of comments. We're feverishly 14 working through those comments, now, and hope to have a 15 final report out, hopefully, by the end of next month. 16 The topic for this panel is "Capturing the 17 Benefits" and there clearly has been a lot that's been 18 done thus far just in the form of having put forth so 19 many programs to encourage people, encourage companies, 20 encourage industries to develop renewable energy, 21 generally, local renewables as well. 22 And so we can go through some of those specific 23 programs and try to identify where some of the 24 particular benefits related to field diversity, reducing 25 the need for distribution transmission upgrades, how

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1 those things are affected by the various programs.

I want to take this opportunity to answer Commissioner Peterman's final question, now, and that way if you ask it again later, I can repeat my answer, which I actually look forward to doing.

6 And this really, largely, comes out of comments 7 that you've heard from other so far. In the first panel 8 you had Arne Olson talking about the uneven distribution 9 of cost when it comes to solar energy.

10 You had Warren Leon talking about the fact that 11 benefits are not distributed in an equal way when these 12 projects are deployed. He also talked about some of the 13 work he did back in Massachusetts to try to identify 14 specific resources that they wanted to try to get 15 offline, and fine ways to strategically go over those 16 individual resources.

And again, Bill just a minute ago talking about biomass and its unequal distribution across the State. From the filter of people who have been staring at local renewables issues for a long time, it really seems, again, to come down to the question of how are we going to plan our energy resources, how are we going to use them?

And we still have very much of a fragmented planning process throughout the State. We have the CALIFORNIA REPORTING, LLC

transmission planning that happens at the ISO, that
 happens at the individual utilities, it's happening now,
 thanks to FERCs Order 100, at the regional level.

4 We've got the Western Renewable Energy Zone 5 process, the process within California as well. We have 6 these various transmission planning process, you have 7 the long-term procurement plan processes that are 8 looking more specifically, more at a high level, 9 generally, in terms of understanding loads, existing 10 resources, and gaps that need to be filled by going out 11 for bid for resources.

12 And what's still not happening in a sufficiently 13 fine-grained way is local integrated renewable planning, 14 where the utilities would break their service territories down into lateral, smaller planning units 15 16 and would, in the context of renewables, go into these 17 areas, understand the particular renewable resources 18 that are promising in that area, understand the nature 19 of the distribution grid in that area, where are the 20 places that could currently benefit from strategically 21 placed local renewables, where are there places where 22 there's a need for distribution upgrades, try to 23 identify transmission bottlenecks and the way --24 addressing load and resources in a particularly small 25 area can wind up affecting the need for those **CALIFORNIA REPORTING, LLC**

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transmission upgrades either through strategic, focused
 energy efficiency initiatives, or local renewables, or a
 combination of all these factors.

With planning on that kind of smaller unit level it's possible to aggregate those units, see how when you add up those pieces how close you've come to reaching your overarching policy goals and then adjust accordingly.

9 But you do it from a much more informed basis 10 than we largely do now by having the planning of these 11 various units being addressed in different fora, and by 12 different people and also, so much on a high level, on a 13 general level and not understanding the nature of these 14 local resources.

15 It seems that the utilities and, frankly, the 16 agencies are going to have to get much more local, now, 17 in terms of understanding how to work with resources and 18 opportunities in order to, I think, capture more of the 19 benefits than we currently are.

20 And with that I'll step back and wait until we 21 get into some of the details later.

22 MR. O'NEILL: Thank you, Steve. Since you've 23 brought up that point do you want to go ahead and jump 24 in?

25 COMMISSIONER PETERMAN: Before you get into CALIFORNIA REPORTING, LLC

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questions I want to just offer -- there's one on each panel, so every moderator's not surprised. Offer an observation before you get into responses, so you see some of the things that I'm thinking about.

5 One thing that seems clear to me, at least from 6 the presentations we've had so far, is that a number of 7 agencies and entities are considering benefits and in 8 their programs are trying to encourage different types 9 of renewables.

But I would probably say except, at least for the parties at the table, except for ARB, no one is monetizing, yet, or incentivizing these benefits.

13 And so an overarching question I'm thinking 14 about is if we do think there are significant benefits and the size of them, we talked about, is not very 15 16 clear, from the first panel, and we want to monetize and 17 incentivize them, then do you do that through the 18 existing procurement programs for electricity, which is 19 primarily how we're funding renewable energy now, 20 through the Public Utilities Commission and through the 21 various POU programs, or do you set up a separate 22 incentive program for these particular benefits? 23 And partly it comes from size and also it 24 becomes partly tied, as Jim pointed out to you, 25 authority that each agency has, as well as income **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 streams.

2 And so that's the general question I'm going to 3 like some feedback on going forward, if anyone has any 4 ideas.

5 So, Gary, back to you.

6 MR. O'NEILL: Okay, anybody want to respond to7 Commissioner Peterman?

8 MR. SNELLINGS: Well, I can offer a bit of a 9 response. This came up recently in a geothermal project 10 in Sonoma County, and it went through the permitting 11 process and the finances, you know, and the tax system 12 and the exemptions comes up whenever we have the 13 discussions about the renewables.

And one thing that they did that didn't cost anybody any money was to establish a point of sale in Sonoma County. And that meant that the distribution of the sales tax could go to the county government, you know, at their proportionate rate.

And that was, I thought, a very clever idea and
that came about through the discussions of CCPDA because
San Luis Obispo County did something similar.

22 COMMISSIONER PETERMAN: Good suggestion.

23 MR. SNYDER: To get to that question partially, 24 I think we were working with Placer County relative to 25 trying to monetize the benefits from a fire threat and

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fire reduction for some of the proceedings before the
 CPUC relative to the feed-in tariff for small
 distributed energy.

And that is a difficult road and it's very difficult to separate the public part of the benefit from the ratepayer part of the benefit.

So, looking at an adder that would be basically serviced through the CPUC rate fee increase on a feed-in tariff basis was hard, it's hard to separate those two pieces out. We thought we'd done a good job but in the end I think they decided to go a different direction.

12 The other piece I think that is of importance 13 relative to us looking forward is this location pieces 14 of it because I do think there were a number of areas that were identified, given where there might be 15 16 opportunities for biomass, that also could be brought 17 online that would provide some locational advantages 18 relative to basically minimizing the need to upgrade the 19 transmission capacity.

20 So, I'm not an expert in that piece, but I think 21 there are locational advantages that could be brought to 22 bear relative to woody biomass. And woody biomass I 23 think, in general, also has a lot of advantages in terms 24 of its base load properties, as well as its abilities to 25 provide and be online at peak periods.

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So there are, I think, a lot of synergism there
 which I think could be taken advantage of.

3 COMMISSIONER PETERMAN: Thank you. 4 MR. HOUSTON: Yeah, I guess taking off from the 5 cap and trade system, we have an environmental science 6 panel, which we have three appointees, natural resources 7 has one, and EPA has one, and the Secretary's really 8 made it a point to get this off the ground.

9 And one of the things they're trying to bite off 10 right now is ecosystem services, which is essentially 11 trying to monetize a benefit from an existing practice 12 and then find a trading partner who needs that benefit.

And it runs the gamut from habitat mitigation, which is one of the things that started this in Texas, was there was an endangered species issue, and they found a farmer who had proper habitat and so they basically developed a trading mechanism where the farmer would create this habitat and get paid by the other entity that was displacing the habitat.

20 And so trying to utilize that type of trading 21 system to, I guess, supplement what is already occurring 22 at PUC and CEC is something we hope to get out of the 23 environmental science panel, out of their work.

24 MR. WEISSMAN: I guess I could offer a couple of 25 comments as a definitely non-quiet kind of person. Like CALIFORNIA REPORTING, LLC

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I said, more questions than answers. What are we going to do with this information once we've monetized all these benefits?

For instance, you talk about what the PUC is going to be doing with its decisions, the way it sets up programs. Its obligation is to try to reflect ratepayer benefits and to stay within that context.

8 If we're starting to monetize environmental 9 benefits, national security, other factors that clearly 10 get beyond the kind of limited selfish scope of a 11 ratepayer in that particular role, then what do you do 12 with that information, how does it affect the outcome? 13 Of course, these things can help inform the 14 public policy debate about what the legislation ought to look like and what the broad policy's going to be. 15 16 But so much of what has driven policy in 17 California, of course, has been such non-monetized 18 things as the loading order, and the renewable portfolio 19 standard, and general strategies such as metering, which 20 are based on that laundry list of objections you 21 referred to that's in the RPS legislation, as opposed to 22 strictly looking at a cost and benefit approach. 23 And so mixing these things is always going to be 24 a challenge.

25 COMMISSIONER PETERMAN: I think that's a good CALIFORNIA REPORTING, LLC

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point and I think even short of monetization formally we do offer, provide preferences for different types of resources which inherently then provide an additional higher value. So in addition to what can State agencies do or the State do, it's also what's the signal to be sent to the private investors about how much they should be valuing a resource. But your point is well taken.

8 MR. O'NEILL: Thank you. So, I want to take a 9 step back and talk briefly about what Steve had 10 mentioned during his comments about looking at smaller 11 regions for procurement through the utilities, and local 12 governments working with the utilities for procurement.

We conducted a survey, recently, of local governments and found that they tend to not work very closely with the utilities, specifically on energy production or energy placement.

17 I was hoping maybe Tim could comment a little 18 bit on that. I mean would there be more benefit to when 19 we're talking about land use planning or zoning for the 20 utilities and the local governments to work closer 21 together, and especially when we're talking about these 22 benefits that link so closely to the surrounding 23 community, or the costs to the community. 24 MR. SNELLINGS: Well, I can just mention that 25 you're right, that's a very accurate assessment that

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1 there isn't a lot of connectivity with the utilities and 2 local government. It seems like there's really two 3 different worlds that go on and I think that's part of 4 what we're seeing as well, and looking to bridge that 5 gap.

6 We've met with our PG&E in Butte County and 7 there's a lot of work to be done there. And their 8 priorities, you know, and their agenda, their processes, 9 their bureaucracy and how it interfaces with the local 10 people, you know, our bureaucracy, there's a lot of work 11 to be done there. And I think I can just acknowledge 12 that and we're just beginning that process.

And I think around the State that is also apoint of view occurring.

MR. O'NEILL: From -- this is for Heather.
Heather, from Cal-ISO's perspective would there be more
of a benefit to bringing this kind of a local view from
a reliability stand point?

MS. SANDERS: Well, you probably know we already do look at local capacity requirements in areas, from the transmission perspective, that are congested.

I also know that we have been working recently with the CPUC and the utilities on deliverability for distributed energy resources, so they can quality for resource adequacy. So, that's a local area need as **CALIFORNIA REPORTING, LLC**

1 well.

This is a really complicated problem when you start thinking about distributed energy resources. Distributed generation, back-feeding onto the system and completely, potentially, modifying the power flows on the system in terms of system protection and control, as well as reliability.

8 So, there are definitely benefits. We do work 9 very closely with the utilities for reliability studies 10 and local impacts. It's just very, very complicated and 11 it can't -- and it's time consuming, and we're working 12 very hard to figure out ways to streamline the process. 13 But we have a responsibility to maintain 14 reliability, us and the utilities, together. So we also don't want to speed through just, you know, yes, let's 15

16 put everything everywhere and hope nothing bad happens.

17 So, it's a very complicated problem.

18 MR. O'NEILL: Anybody else like to add anything? 19 MR. WEISSMAN: Yes, it's a very complicated 20 problem, but there not only are complicated questions 21 about how you do planning on a local level, there are 22 also complicated effects from what happens in local 23 areas.

And so as I think that maintaining that mission of system reliability, I think we've had a tendency --

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we, I guess I'm thinking about my past role at the PUC, and other governmental entities have probably had a tendency to encourage a movement back from looking at what's actually happening on the ground in local areas, both in terms of agreeing with the utilities as over the last few years they've cut back on local offices and presence within various communities.

8 Utilities probably used to be in the strongest 9 position to understand what was going on in individual 10 communities because of relationships that they 11 maintained on that level.

12 There still are people in the local areas, but 13 it's not at the level of intensity that it used to be. 14 And then with things like the long-term 15 procurement process, where year after year the utilities have been permitted to take a very high level look at 16 17 their resource needs by the fact that the PUC tends to 18 create, the word's got to come up at some point, so many 19 silos for considering these policy matters. 20 Look at some of the long-term procurement

decisions and you'll see, for instance one classic decision a small number of years ago, that you opened up the first page and inside the first page is the list of all the proceedings where the various aspects of utility service are actually being considered.

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1 So you've got, you know, the transmission 2 proceedings, the energy efficiency proceedings, the RPS, 3 et cetera. And so we've kind of forced the consideration of these individual components to the 4 5 system to be fragmented. 6 And then with the creation of an ISO that's told to make things reliable, and so to do that on the 7 8 transmission level. 9 And so the interests are at the larger scale and 10 they're also -- it's also one entity that's hardly in a 11 position to be able to reach into every neighborhood and 12 understand the nuances that apply. 13 MR. SNELLINGS: Gary, if I could also add the --I was thinking, as counties pursue this renewable energy 14 15 overlay strategy to identify those sweet spot locations 16 in their jurisdiction for future projects, that would 17 drive the discussion with the utilities as well, because 18 that's going to be a real partnership project. And so 19 that's on the horizon. We have to figure out funding, 20 but that's going to be in everybody's future. 21 MR. O'NEILL: Great, thank you. With that, 22 we're going to move on. 23 Oh, do you have one last comment? 24 MR. CLIFF: Yeah, just make one last comment. 25 So, it's interesting from my perspective in listening to **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 this because I think there are pretty significant 2 incentives for renewables and biomass. Of course, at 3 ARB we've got the low carbon fuel standard. There's, in 4 statute, the renewable portfolio standard and then cap 5 and trade, as I discussed earlier.

6 And it sounds like there's, you know, these 7 other barriers to sort of getting those projects 8 underway or actually encouraging, or breaking down some 9 of the barriers that are otherwise discouraging projects 10 to happen.

And I guess from our perspective this is kind of a good learning experience. You know, we hear about the digesters that can't be put in for various reasons, or otherwise not being able to get that gas to some useful end point, you know, or other local permitting type challenges.

So, I think that's -- it's useful for us from a learning experience, but I did want to note that I think there are a lot of incentives out there, and especially cap and trade, you know, low-carbon fuel standard, and things like that I think will provide pretty significant incentives as we move forward.

23 So there is the ability to monetize, it really 24 is about how do you break down some of the barriers that 25 exist to getting things actually moving on the ground.

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1 COMMISSIONER PETERMAN: I just had another point 2 on that, too, because I think you're right that cap and 3 trade, and LCFS do provide these incentives.

And it's about also making sure that projects that are small size, as well can participate in those incentives.

You know, there are complicated systems and I
think you need a team of lawyers, more than you do staff
sometimes, oftentimes to go through our processes.

And so one of my general concerns is, you know, how do we allow more people to participate in the economic opportunities that we've talked about, which often are on a first come/first served basis, if you will.

15 And there are certain technologies that might be 16 less mature, what have you, but could have a role, but 17 in terms of timing aren't being invested in.

But I'm glad, also, you're learning from the panel because I want you all to feel this is productive as well.

21 MR. O'NEILL: I'm going to go ahead and take a 22 step back and get back on the direct benefits questions. 23 I'm going to first focus on the agencies and 24 then we can have the other panel discuss -- start with 25 ARB.

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1 When we're talking about the benefits of 2 renewable energy and how they impact your policy 3 decisions, I quess one way to look at it is what would be the outcome if we didn't reach some of our renewable 4 5 energy goals, or if renewables weren't around what would 6 be the alternative strategy to achieving, for example, 7 the GHG emissions that we're calling for, or for CDFA, 8 and for Cal Fire waste reduction and fire reduction 9 qoals?

10 MR. CLIFF: Sure, so in the Cap and Trade 11 Program, one of the ways that it works together with the 12 Renewables Program, and these other types of direct 13 emission reduction measures is it quantifies the total 14 amount of emissions that are allowable.

And to the extent that a particular policy tries to require reductions in a given sector, or through a given technology, then that will also help reduce emissions under cap and trade.

19 If the emission benefits of those particular 20 measures aren't achieved, or if demand is greater than 21 we otherwise expected, cap and trade would still overall 22 limit the emissions that could occur.

23 And so, by definition, cap and trade would sort 24 of find the least cost reductions somewhere else in the 25 economy. And that may be just a demand response, people CALIFORNIA REPORTING, LLC

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simply use less as a result because there is an
 incentive to do so.

3 So that's sort of how cap and trade works well
4 with these other policies.

5 I think that the intensity type standards, like 6 the low-carbon fuel standard, the renewable portfolio 7 standard, trying to achieve reductions in a particular 8 area of the economy, where there might otherwise be 9 barriers or that sets us up for the right type of path 10 for this kind of long-term future goal.

And so it's necessary to make sure that we also see the benefits of renewables, and that's why we have an RPS, but that we achieve our emissions limit.

So, I think that's really the intent of thosetypes of policies and trying to have them work together.

MR. HOUSTON: Yeah, I think we try and take a holistic approach to understanding how these policies will affect food production. I mean at the end of the day, you know, we're trying to promote food production in the State, which is really good for the citizens of the State because they all need to eat.

You know, we kind of need to find out and make a real push in the past, you know, ten to 15 years, encouraging, you know, better nutrition, more fresh fruits and vegetables, purchasing more products locally,

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1 which has greenhouse gas benefits.

2 So to the extent that you can't find a way to 3 monetize and capture the benefits of some of these externalities from agriculture then, you know, the 4 5 alternative would seem to be a more sort of commanding 6 control, you know, penalistic system which would, you 7 know, probably discourage food production or at least 8 make it less efficient. Combine that with a growing 9 population, and climate change, and you sort of -- you 10 have a tendency to kind of exacerbate the problem 11 because then you're going to start shipping stuff in 12 from South America and China, which has its own sort of 13 attenuate greenhouse gas problems. 14 So, I think we're trying to find a way to 15 incorporate these benefits so that we have, you know, sort of an accurate, holistic picture of the various 16

17 needs that we have here in society.

And I think, you know, energy and food share a lot of similarities, you know, namely they're primarily responsible for our sort of modern industrial age, and they're something that's -- that we need to have consistent quality and we need to rely on.

23 So, I think that's sort of how we try and 24 incorporate some of these benefits in our policy 25 choices.

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1 COMMISSIONER PETERMAN: And Jim, if I may, very 2 glad to have Food and Ag here represented, because we 3 don't do enough things of coordination. You're right, 4 the connections between Food and Ag and Energy are 5 enormous.

6 Not to put you on the spot, but do you have any 7 kind of statistics, just to remind us in a sense of the 8 size of the agricultural economy in California, and the 9 food production? You know, we're talking about 10 opportunities, I just want us to have a sense of that 11 magnitude.

MR. HOUSTON: Yeah, yeah, 35 billion -- 35.7
billion is the size of the agricultural economy in this
State and that's farm gate value.

15 And then, you know, the other things to sort of 16 think about are the projections about the need to 17 produce food.

And, you know, a really interesting and I guess accurate statistic is that by the year 2050 we, and I don't mean we in California, but we in the world will need to produce as much food in one year to feed the population as we have produced in the entire history of agriculture up until this point.

24 So, you know, that just sort of gives you -- you 25 know, I mean I guess we'll find out in 2050 how accurate CALIFORNIA REPORTING, LLC

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1 that is.

But I mean that gives you a scale of the problem that we face with the growing population and as we, you know, advance the quality of life. And so I guess that's a good statistic.

6 COMMISSIONER PETERMAN: So, kind of the extent 7 of the potential environmental externalities expands 8 incrementally --

9 MR. HOUSTON: Yes.

10 COMMISSIONER PETERMAN: -- accordingly, so okay. 11 MR. HOUSTON: Yeah, absolutely. And, you know, 12 there's all sorts of data that we haven't talked yet 13 about, the whole land use planning. But, you know, soil 14 is not something that's easily replicable.

So, you know, in terms of the solar PV, and wind placement, and understanding the interaction between prime ag land, et cetera, you know, there's lots of -- I kind of picture like a Ven diagram, you know, and there's lots of little circles on this diagram that are interconnected.

21 MR. O'NEILL: Bill, do you want to add anything? 22 MR. SNYDER: Yeah, I think for us the clear 23 threat to a lot of these landscapes and communities is 24 wildfire. I do think we all recognize that as climate 25 changes there will be other threats in vectors that are CALIFORNIA REPORTING, LLC

going to drive vegetation change and loss. But wildfire
 certainly has a whole host of indirect effects on
 health, air quality, the ecosystem, water quality, and
 all sorts of things.

5 So, you know, the challenge there is real that 6 the magnitude of the problem in terms of the number of 7 acres that have excess biomass on them is significant in 8 California.

9 At a time when we're trying to increase the 10 renewable portfolio standards and looking at biomass 11 being an important part of that, we have run into 12 barriers relative to actually how to monetize some of 13 this at a level that will allow for a reasonable level 14 of treatment.

15 So what we've been forced to do, then, is focus 16 what monetary resources we have in areas immediate to communities to provide for direct community safety. But 17 18 we really have not been able to address some of the 19 clear protection needs for forested landscapes and other 20 pieces, and certainly coming up with some solution that 21 might monetize the values that those natural landscapes 22 provide, and allow us to do a little more treatment, in 23 a sustainable way, that recognizes the ecological 24 functions out there and protects those is the next big 25 step we need to take.

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1 COMMISSIONER PETERMAN: Is that going to be your 2 recommendation at the end, when I come at you for it? 3 MR. SNYDER: Well, certainly. I think, you 4 know, we've really been looking at not only what we can 5 do to prop up the existing woody biomass plants, but 6 also to improve the location of larger, you know, less 7 than 50 megawatts, or so. 8 And then I do think the future in some of this 9 is going to be distributed in small distributed 10 facilities that are more focused on specific locations. 11 And looking at those, you know, in general, to make 12 those work at a fuel price of \$45 to \$50 a ton delivered 13 to the facility, we're looking at a 15 cent or so per 14 megawatt, or kilowatt value. So, it's -- it is a 15 challenge. 16 And I think the technology is there, it's just 17 going to be figuring out how to solve some of the other 18 puzzle pieces. 19 MR. O'NEILL: Do you have anything to add? MR. WEISSMAN: Well, just, you know, back to the 20 21 original question, I think this is a question of what 22 happens if we don't achieve the renewable energy goals 23 in the near term? 24 I think that it may be very feasible to achieve

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25 the Scoping Report's 2020 goals through the Cap and

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Trade Program without having as much renewable energy as
 we aspire to.

But I think in the long run, for the 2050 goals, that probably is not going to be an option. And you probably are aware there's two recent studies that both kind of hovered around the Lawrence Berkeley Lab that asked what does a realistic build out have to look like by 2050?

9 And talked about needing to electrify everything 10 we possibly can in the transportation grid, use biofuels 11 for the parts you can't electrify, squeeze as much 12 efficiency as you can out of demand, and then take 13 virtually all of the carbon out of electricity 14 production.

And, you know, unless we have a very significant ramp up of nuclear power in the State, that's probably going to mean that we have to have a very major reliance on power.

19 So, I think that establishing these goals and 20 working towards them, again regardless of how they might 21 initialize monetize, is going to be of critical import. 22 MR. SNELLINGS: At the local perspective it's 23 that every city and county has a general plan that we're 24 required to adopt in California, and it's actually AB 25 32, SB 375, CEQA, they're all critical aspects of what 26 CALIFORNIA REPORTING, LLC

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1 we must address in our general plans.

2	The general plans call the constitution for
3	development to California and it requires us to adopt
4	goals, policies, and actions that are real. And these
5	are not just, you know, touchy/feely things, these are
6	real things that are the policies of the county.
7	Every ordinance that follows has to be
8	consistent with the policies and goals of the county.
9	The county, itself, has to act as a good citizen and
10	comply with this general plan, you know, and set the
11	example for the community.
12	You know, so the idea of incentivizing solar,
13	you know, we model that as a county and counties do that
14	throughout California.
15	Each county and city is in the process of
16	writing climate action plans.
17	You know, we're dealing with the requirements of
18	greenhouse gas reduction.
19	You know, we have a chart in our general plan
20	and it's a simple table, it just shows a line going up
21	45 degrees and it says this is how greenhouse gases are
22	going to continue to increase with business as usual.
23	And then it kind of shows a 45 degree the other way in
24	about 2010, when our plan was adopted, and showing those
25	greenhouse gases need to go down.

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How do you do that and continue to have an economy that you're trying to incentivize, encourage, streamline?

And so it's through policies, it's through being very clear what the policies are, and we're defining those actions through climate action plan.

7 And then adaptation to climate change, that's8 another thing on the horizon that we've got to address.

9 And so there's a lot of planning efforts going 10 on at the local level to comply with these very real 11 laws that we must comply with.

12 So, we're trying to be good citizens at local 13 government, and provide that leadership to our citizens 14 and businesses.

MR. O'NEILL: Thank you. I'm going to shift gears a little bit and talk about displacement of fossil fuels with renewables, our renewable resources that displace fossil fuel generation being appropriately rewarded.

I'm going to go ahead and open this up withSteve, first.

22 MR. CLIFF: Well, to answer these questions, you 23 started going back through all the various initiatives 24 we have in place and you can see how they might differ 25 in this regard.

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1 I think starting with the portfolio standard 2 certainly there's some fuel displacement rewarded just 3 by the fact that a certain amount of -- because the RPS 4 program's largely agnostic about the source of the green 5 kilowatt hours, there's certainly a loss of benefit 6 There's a lack of rewarding the greatest, the there. 7 potential for displacing fossil generation just because 8 of the intermittency of solar, and wind, and the need to add back-up resources of various kinds. 9

10 In terms of renewable, the RAM, the auction 11 process, of course there's been an effort to create 12 buckets with different kind of resources in them, base 13 load resources, peaking resources, non-peaking resources 14 and the implication is that various renewable 15 technologies will fall differentially into those 16 buckets.

Well, the results the first time around seem to
suggest that there's not a lot of variety to what's
being successfully bid in. We have almost all solar
across the State in terms of the resources.

21 So, I think there's probably going to have to be 22 some changes there as well.

The same thing with the feed-in tariff, there's this -- a fuel bucket approach is going to be a differential of prices, ultimately, I think, for

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different renewable resources. But that's going to be something that's evolving over time and is going to be largely effected by the way the RAM prices change, since RAM's going to be influencing what happens with the feed-in tariff. So, I think there's more that needs to be done there.

And then, quickly, net metering, entirely fuel neutral, but largely solar that's being promoted there, so again you have intermittency. It's not really optimizing what you can do in terms of fossil fuel displacement.

12 And then CSI, of course, is entirely solar, so13 same answer there.

14 COMMISSIONER PETERMAN: All right, and I'll add 15 that at the conference that Steve mentioned, that he led over the summer, I facilitated a panel on procurement 16 mechanisms. And, indeed, we went through the fact that, 17 18 both, we have a number of procurement mechanisms in the 19 State and that they all address some of these issues to 20 some extent, but there are a number of benefits that are 21 not addressed.

And can you build them into the existing set or are you once again going to add another procurement process.

And it's a struggle to figure out how to make CALIFORNIA REPORTING, LLC

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1 something both competitive and open, but also

2 specifically providing for some of those benefits.

3 So, thank you for providing a little background4 about some of the ones we already have.

5 MR. WEISSMAN: Well, it seems like the big 6 enchilada there is renewable portfolio standard and the 7 California standard is so progressive and forward 8 looking in so many ways that I think that's probably the 9 biggest challenge.

10

MR. O'NEILL: Bill.

11 MR. SNYDER: I guess I could characterize the, 12 you know, the fossil fuel displacement piece relative to 13 woody biomass is very complex. And I think, certainly, 14 we have recognized that we do need to focus more on 15 lifecycle analysis to kind of figure out where we are 16 relative to fossil fuel displacement benefits.

17 I think there are a number of competing pieces 18 that come into play there, one of which is can we 19 sustain the level of woody biomass on the forested 20 landscapes? And probably the answer to that 21 ecologically is no, in the face of changing climate. 22 So as you utilize this, you're probably going to 23 have to make an assumption a certain portion of that 24 won't be re-sequestered in that growing vegetation 25 because the vegetation's just not going to support the **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

same level of biomass or carbon that currently is being
 sequestered so, certainly, probably some long-term
 emissions there programmatically.

But looking at the other pieces of it in terms 4 5 of the drivers that are going to result in relatively 6 stochastic emissions, such as wildfire, insect and drought, how to factor all of that into a lifecycle 7 8 analysis is probably something that has been the golden 9 ring, and probably needs to be given some thought and a 10 lot of workshop thought put into what actually would go 11 into a credible lifecycle analysis to really look at the 12 benefits from a fossil fuel displacement perspective, 13 along with all of the other potential benefits that 14 could be brought to bear by a thoughtful program 15 utilization of woody biomass for energy. 16 MR. SNELLINGS: I'd just mention that one of the other documents we wrote, as far as the model solar 17 18 energy facility ordinance process, was the Solar Energy 19 Facility Guidance document that has a lot of good information about net metering, feed-in tariff, RAM. 20 21 And one of the things, I think, that became 22 clear to us is there's still a need for a lot of

23 education.

24 And we have, for example, the PACE program. It
25 kind of crashed and burned a little bit with Freddie and
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1 Fannie, and now it's coming back, at least on the 2 commercial side. And so those programs are showing up, 3 again, and the counties and cities are looking to facilitate different funding mechanisms to help 4 5 reenergize that program. 6 And so there's a lot of -- I just think there's a lot of need for education about whether it's community 7 8 choice aggregation that's being talked about, that 9 people don't quite understand it and we need to talk 10 about the benefits and whether it fits in an area or 11 not, and how it might benefit a region or not and just 12 continue those discussions. 13 So, education and leadership through this process, I think, is really an important part of the 14 15 solution. 16 COMMISSIONER PETERMAN: I'm glad you hit on the 17 point of education because you're right, there is a lot 18 of information to consume. And as we're trying to 19 quantify the benefits also making sure that people 20 understand them. 21 You know, we manage 15,000 web pages, if you can 22 imagine that, in terms of information. And so I don't 23 know if people always realize that and you kind of hope 24 that the average consumer will take a look at the

25 website and learn some things, but who's got the time.

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And so I appreciate the role that the counties can play
 in that.

3 MR. SNELLINGS: I think it's kind of the train, 4 the trainer model is what I like and see it to be 5 effective, and so have a bunch of messengers throughout 6 California that are launched into this educational 7 arena.

8 MR. HOUSTON: I think for -- I guess in terms of 9 biomass I mean I would say that it's probably not 10 adequately incentivized in terms of fossil fuel 11 displacement.

I mean one of the things that I like to think about with respect to biomass is that it's really fossil fuel replacement. That, you know, what we've heard from Cal-ISO is this sort of -- this need for certainty.

I mean and the way that, at least today, the way we can get that certainty is, you know, either through nuclear power or through spinning the turbine. And that turbine needs to spin somehow and the most consistent way seems to be to burn something and use the steam to power it.

So, to the extent that we can use biomass, either as a biofuel in a car or to burn at a biomass plant, you know, we are displacing a category of fossil fuel that is distinct from other renewable technologies CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 because it can provide base load and because it's
 dispatchable. So you can store it, and then you can
 produce extra power when needed.

4 So there is, I think, flexibility for entities 5 like Cal-ISO and for the State's energy security that 6 probably aren't entirely captured by the existing, you 7 know, feed-in tariff and RAM mechanisms.

8 MR. O'NEILL: Heather, first and then we'll --9 MS. SANDERS: Okay. From the ISO perspective, 10 we don't really have an opinion on whether renewables 11 are being compensated appropriately for displacement. 12 But I thought what I'd share is that it seems to be 13 working because we have 65,000 megawatts of renewables 14 in the queue right now, and 356 projects. So there are 46 wind projects, over 12,500 megawatt solar projects, 15 257 projects, 26,000 megawatts. 16

17 There is actually one battery project, lithium18 ion battery, it's eight megawatts, 32 megawatt hours.

19 There are four biomass projects for 88 megawatts 20 and five geothermal projects for 651 megawatts. And two 21 landfill projects for 14 megawatts.

22 So, something's working, we're getting a lot of 23 this proposed in the queue. We know that it all won't 24 materialize, but we are seeing a lot of it.

25 And I know that utilities are seeing significant CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

amount of projects for distributed generation as well.
 So, something's working, we're seeing a lot of it,
 that's what's putting pressure on our planning
 processes, as well.

5 To get to the point about incentive and valuing 6 these flexible resources, we're working on reflecting 7 our needs better because we do need to value those 8 resources that have dispatchability and the things I 9 mentioned, the maximum continuous ramping load flowing 10 in regulation capabilities.

And the two ways we're doing that is one is to try to define what those needs are in terms of the only capacity procurement mechanism we really have right now through the PUC is resource adequacy in the long-term planning process.

But also through a new product offering that we're calling flexible ramping to really help those resources that have those capabilities come into our market and then get awarded based on that.

20 There's also a number of adjustments happening 21 in the regulation market, based on FERQ ruling,

22 including pay-for-performance, which rewards an entity

23 for how much it moves and how it performs.

24 So, we're really working hard to make sure we're 25 sending the right signal to the types of resources we

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1 need.

2 COMMISSIONER PETERMAN: Thanks, that was very 3 helpful and that was a very positive portrayal of the 4 ISO queue, I liked that. In a good way, it's a very 5 good way to presenting it that there is a variety, a 6 diversity within the queue. We all talk about the size 7 of the queue, but it's nice to talk about the diversity 8 within the queue as well, so definitely.

9 MS. SANDERS: It is good because it's hard and 10 we always hear about how, you know, it's not working. 11 But something's working, there's a lot of generation in 12 there. So, thank you.

13 MR. O'NEILL: Steve.

14 Yeah, I guess from my perspective MR. WEISSMAN: it's important to break down what sort of benefits there 15 are, which obviously is the point of this workshop. 16 So, 17 from a greenhouse gas emissions perspective I think 18 that, generally speaking, we're realizing the benefits 19 of renewables if we have particular goals in mind, which 20 AB 32 of course says.

21 But there are other benefits, as have been 22 discussed and, you know, are those benefits being 23 realized is important to discuss. But you have to sort 24 of break down each one of those pieces separately 25 because there's probably not a one-size-fits-all policy 26 CALIFORNIA REPORTING, LLC 27 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

that would get at the types of benefits that might be
 otherwise realized.

3 So, for example, the local benefits where you 4 can realize, save sales tax, you know, in a local 5 community, things like that, those are the types of 6 things where a more specific policy to a given region 7 might be really important.

8 But at the same time recognize that sometimes if 9 you put too many incentives on something, you can have 10 adverse outcomes that you wouldn't otherwise expect. 11 And so I think we have to very carefully balance those 12 types of considerations when thinking about how many 13 incentives should be put on a particular type of thing 14 relative to the benefits.

15 COMMISSIONER PETERMAN: And although I believe 16 I've heard probably from most of you, Gary, as you're 17 wrapping up this panel I would ask you to go around and 18 ask everyone their first recommendation, and I also want 19 to make sure we get yours. Because some of you may not 20 know, but Gary is the Agency's lead authority on 21 bioenergy and has been working on this space for a 22 number of years, and looking forward to hearing his 23 first recommendation as well.

24 MR. O'NEILL: We'll go ahead and start with 25 Steve Weissman.

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1 COMMISSIONER PETERMAN: He gave us a preview so 2 you can go ahead and just recycle that one. 3 MR. WEISSMAN: Well, yeah, actually, I thought I 4 was going to have a minute to think this through and 5 give you another one but --6 COMMISSIONER PETERMAN: All right, you can give 7 two. Go ahead, we've got six minutes. 8 MR. WEISSMAN: All right, then I pass and you 9 can come around again. 10 MR. O'NEILL: Okay, we'll move on to Bill. MR. WEISSMAN: Okay. 11 12 MR. SNYDER: I think our recommendation would be 13 to explore ways to monetize, you know, the woody biomass 14 markets, to capture not only benefits to ratepayers, but also public benefits associated with the utilization of 15 16 that material for production of energy. 17 MR. SNELLINGS: I've heard in some other circles 18 some discussion about the idea that counties and cities 19 should adopt an energy element, and I would caution that 20 that's not necessary. 21 Just as an example, in Butte County's General 22 Plan we have 92 references to energy and it's spread 23 across circulation, conservation, safety. So, it's much 24 akin to a discussion we've had a lot about 25 sustainability. Should we have a sustainability **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

element? Well, not really, sustainability's spread
 across all of our elements.

And so I would just hope that we don't have to go down a legislative approach to requiring an energy element, it would be unnecessary.

6 COMMISSIONER PETERMAN: I have to say, before we 7 move on to Heather, Tom, I appreciate -- Tim, sorry, I 8 appreciate you offering a recommendation of what not to 9 do.

10 MR. SNELLINGS: Okay.

11 COMMISSIONER PETERMAN: Because that is one of 12 the things that I think we try to focus on in government 13 is avoiding the worst activities, and so that's a nice 14 spin on it, so thank you.

MS. SANDERS: For the ISO, it's similar to what I said before is really the focus on flexible capacity needs and so we can integrate as much of these renewables as possible. So, the consideration of what it takes to integrate these both locally and on the system, and the flexible capacity needs.

21 MR. HOUSTON: Yeah, our recommendation actually 22 comes as an outgrowth from the Fed/State Digester, and 23 that's an establishment of a specific procurement 24 mechanism for biogas of 200 megawatts. I think this 25 will provide a great incubation period for the

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1 technology and allow it to compete on a level playing 2 field with other like projects. And, you know, as we 3 develop and monetize these benefits I think, you know, 4 maybe you can ease the incubation, but some strong 5 signal now to incentivize these plans. 6 COMMISSIONER PETERMAN: And did you say under 7 200 megawatts? 8 MR. HOUSTON: We wanted a goal of 200 megawatts. 9 COMMISSIONER PETERMAN: Oh, a goal of 200 10 megawatts for the procurement target. 11 MR. HOUSTON: Yeah. 12 COMMISSIONER PETERMAN: Okay, thanks. 13 MR. CLIFF: Yeah, I have two things. The first is, and it was mentioned earlier, is that education is 14 extremely important. A lot of people talk about 15 16 incentives and think of that as being sort of a check 17 that's handed to you. 18 But I think there's incentives that are more 19 subtle and to the extent that people understand that 20 there are those incentives out there, and that they can 21 think about that, that helps them think about their 22 long-term investment, it's really important to get that 23 word out. 24 The second thing is, you know, I think this is 25 said a lot, but isn't always followed, especially among **CALIFORNIA REPORTING, LLC**

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1 policy makers, include myself in that, is that we need 2 to give certainty for as long as possible, as soon as 3 possible.

And so to the extent that we have a long-term energy plan that really does set us up for our long-term goals, we need to get that plan out there, you know, set up the policies to get to that and do that sort of as quickly as possible so that people can start, you know, taking advantage of those incentives and getting us on track.

11 MR. WEISSMAN: Okay, I guess I got an extra 12 minute, didn't I? So, I guess the thing that I would 13 just probably emphasize is that we didn't get a chance 14 to talk about displacing the transmission and 15 distribution. And if you move through the various 16 programs, I think you'd see that some of them are 17 starting to identify, or at least identify the costs of 18 transmission or distribution upgrades.

And in the Rule 21 revision we're seeing a rewarding of things that are not going to impose big interconnection problems because they're being fasttracked, that that proposal gets approved. That's great.

24 But what we're not seeing, really, so far is any 25 effort to reward monetarily for actually displacing

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otherwise planned distribution upgrades or transmission upgrades. And so I think finding ways to move in that direction, despite the fact it's going to be a big challenge to really link projects to displacement I think it's an important thing to look for.

6 COMMISSIONER PETERMAN: And Gary. Careful, you 7 might have to actually then do the recommendation after, 8 but --

9 MR. O'NEILL: I'll make it very broad.
10 COMMISSIONER PETERMAN: Okay.

11 MR. O'NEILL: I my perspective, resources and 12 technologies are different and we need to start treating 13 them differently. So, various different types of 14 renewable resources, like solar, wind, biomass there are different technologies to harness those various 15 16 resources. And different technologies are more 17 appropriate in different regions and that's something 18 that needs to be taken into consideration when we're 19 setting up our policy goals.

20 And this is probably a place where we need to 21 bring the locals more in line or into the room talking 22 about these things, and bring them to the table so that 23 they can weigh in on what their local needs are as far 24 as, you know, do they have too much waste? Do they have 25 too much biomass? Do they have too much whatever? Do 26 CALIFORNIA REPORTING, LLC

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they need more solar? Is there local reliability weak?
 Things like that.

3 And when we're developing our goals bring the locals to the table, bring the utilities to the table 4 5 and, again, bring Cal-ISO to the table, and also the 6 various agencies that have -- like CDFA, and the Forestry Service so that, you know, everybody can come 7 8 together and discuss what each regional need is and what 9 the best technology is to harness the resources that are 10 available there. 11 COMMISSIONER PETERMAN: That's great. I thought 12 you might say pay the analysts who work on these 13 complicated issues more money, which I would also be 14 supportive of. And I'll just assume that's your second 15 recommendation. But that was a very good first one, 16 thank you. 17 MR. O'NEILL: All right, thank you. 18 MS. KOROSEC: All right, thank you to our 19 panelists for this morning, it was good discussions. 20 And we will break now for lunch and reconvene at 21 1:30. 22 (Off the record at 12:27 p.m.) 23 (Reconvene at 1:38 p.m.) 24 COMMISSIONER PETERMAN: I don't know if we have 25 an introduction. Well, I think we're going to just **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

confirm some audio/visual things, so just think amongst
 yourselves and bear with us for a second.

3 I'll use this opportunity to also say, for all of you in this panel, as well as in our six workshops to 4 5 follow, and I will ask at the end of today's session 6 that we also put up, once again, the list of the 7 workshops and the dates, so everyone can be aware. 8 Oh, pardon? Oh, please turn your nametags 9 around so that I can see them. Thank you. 10 And I'll also take a moment, once again, to 11 publicly thank the IEPR staff, the renewables staff who 12 all worked on this, and for all of you panelists for showing up here today, greatly appreciate it. 13 14 Well, with that, I'll introduce the panel moderator, Kate Zocchetti, who is in charge of all 15 16 things renewable. I don't know her official title, now, 17 we talked about it's changed a little bit, but she can 18 introduce herself. 19 MS. ZOCCHETTI: Thank you, Commissioner 20 Peterman, I'm Kate Zocchetti. My working title is 21 Technical Director of the RPS Program here, at the 22 Energy Commission. 23 I'd like to welcome you all and good afternoon, 24 I hope you had a good lunch. And I don't think it's

25 raining anymore, so that's a good thing.

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I just have a little opening comments because I
 am all things RPS, so I thought I would kind of put an
 RPS slant on it to open the discussion.

4 When the RPS program began in 2002, the statute 5 set forth some benefits for California and I'd like to 6 just read those off, which was to increase California's 7 reliance on renewable energy resources, promote stable 8 electricity prices, protect public health, improve 9 environmental quality, stimulate sustainable economic 10 development, create new employment opportunities, and 11 reduce reliance on imported fuels.

And now that we have a 33-percent RPS target and 12 13 we have new legislation, the goals have been expanded, 14 as I think Commissioner Peterman mentioned this morning, that we have nine goals now set forth in the statute. 15 Not unlike the earlier goals, but they have gotten more 16 specific and the statute notes that these are unique 17 18 benefits for California, that any one of them can be 19 achieved with the RPS.

20 And I noted kind of the differences that I'd
21 like to point out. One is replacing fossil fuel,
22 specifically. Adding new electric generating
23 facilities, reducing the emissions of greenhouse gases
24 associated with electricity generation, creating a
25 diversified and balanced energy generation portfolio,
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1 meeting the State's resource adequacy requirements,
2 contributing to a safe and reliable operation of the
3 grid, and implementing the State's transmission and land
4 use planning activities related to the development of
5 eligible renewable energy resources.

6 So I thought that was interesting that the RPS 7 is being called upon to meet even more aggressive and 8 specific benefits.

9 So I think to achieve these benefits for 10 California, I'm really looking forward to what the 11 panelists have to say today, particularly how government 12 can play a role.

13 So, welcome all of you and each panelist will 14 have a few minutes to introduce yourself and have some 15 opening remarks. I'd like to start to my right.

MR. JOHNSON: Good afternoon, Aaron Johnson -good afternoon, I'm Aaron Johnson, with PG&E, thank you for having me.

I want to compliment the Energy Commission, I
thought I had put together the leanest PowerPoint I'd
ever done with four slides, and it was reduced to two,
so I will focus those two.

23 COMMISSIONER PETERMAN: It's all about24 streamlining government, here we go.

25 MR. JOHNSON: So, a couple of points I wanted to CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 make as part of this conversation. The first slide, if
 you would, this is a graphic that depicts the various
 programs that are in place to support renewables
 throughout California.

5 You see the more orange-colored programs are 6 more on the customer side, the blue, these are more 7 utility-side scale programs.

8 And along the bottom we have sort of a megawatt9 access.

10 And these are a variety of programs that are 11 available to PG&E, and many of which are mandated, that 12 allow us to access renewable energy.

I bring this up mainly to highlight the issue that there are a lot of programs that have been set up in California to support the RPS, and I think it's really important to recognize we've created a tremendous number of tools to access renewables and to add renewables in California, and we are doing that at a guite unprecedented pace at this point.

20 And I think it's really important to look at 21 this, and look as we talk and have a conversation about 22 costs and benefits to recognize that to the extent that 23 we continue to add specific niche programs, carve-outs, 24 if you will, for specific technologies, there's a danger 25 that we're not drawing on the benefit of, you know,

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having all of these different resources compete against
 each other and ultimately get the lowest costs for
 customers because at the end of the day all of these
 programs are paid for by our customers and those of
 other utilities.

I think, since we're having a public policy
conversation around energy, I wanted to -- the second
slide I wanted to introduce is really about local
emissions. And this came up from some research that our
staff did when we were involved in the 33-percent RPS
discussions.

12 And it was quite striking to me, you know, 13 several years ago when we were beginning the 33-percent 14 legislative conversation, is that when you really look at statewide emissions and you can go air district by 15 16 air district in California and the results are almost 17 exactly the same, what you find is that NOx and 18 particulate matter, which are the two primary local 19 emissions that we're usually talking about, are not 20 really driven in the State by power plants. And it's 21 about one percent of the emissions -- it's about 10 22 percent of the emissions in both categories come from 23 point sources and, of that, about 10 percent of that is 24 power plants.

25

And what you see here is the data on that, that **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

basically -- and this is just ARB data, off the ARB
 website, that shows you that, you know, local pollution
 isn't really being driven by power plants.

And I think there's a perception in the conversation that this is a huge driver of local pollution that power plants are. They're very noticeable, they're very big, they have big smoke stacks, we understand that, but they're not the primary driver in this conversation.

And it's actually interesting to note that there was actually a study that's done annually by the South Coast Air Quality Management District, and they actually roll up all the emissions into cancer-causing levels and then identify the top 280 point sources in their air district.

And if you look at that list, there's only one power plant in the top 100, and that is the Catalina Power Plant. And I'm sorry to give Edison statistics, but none of the air quality districts do this study in Northern California.

21 And that's Catalina, and that's primarily 22 because Catalina has the ability to burn oil as a backup 23 fuel because it's out on Catalina Island.

And so part of the calculation assumes that they do burn some oil.

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1 So, that's the other thing as we start talking 2 about benefits and costs, I think it's really important 3 to recognize that some of the emissions that we're talking about, you know, if this was a GHG graph, which 4 5 was my other graph, you know, there's a much more -- a 6 much bigger story to tell for the utilities because we 7 have a very considerable share of that pollution in the 8 State. And that, I think, is very justified in pushing 9 the utilities to reduce those emissions.

10 But on the local pollution standard -- or on 11 local pollution emissions, that's not really the driver. 12 The last issue I really wanted to talk about was 13 sort of how we actually do costs and benefits in 14 selection our resources. And I'm actually going to defer to my colleague from Edison, Marc Ulrich, because 15 he had a -- basically, in his two slides he got the 16 graph that I -- we removed from mine which, really, in 17 18 our process is very similar, that talks about what 19 things do get weighed and not weighed in that. 20 I will just summarize by saying it's 21 predominantly energy things and there aren't a lot of 22 other factors that are weighed.

23 We do weigh those on a non-quantitative basis, 24 so it's more of a qualitative basis. But to be very 25 candid, that's not what's driving right now how we do CALIFORNIA REPORTING, LLC

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procurement. It's really about the energy values that
 you get from these different resources.

3 The one thing that we do, do today, is we sort
4 of have a go, no-go screen from an environmental
5 perspective, and it's mainly around species issues.
6 And, you know, if a particular renewable
7 resource is in an area where our environmental folks and
8 land review folks feel has particular endangered species

9 or something, we will just simply remove a project from 10 consideration. But it's got to be -- that's really the 11 only place where those sorts of factors that are not 12 purely economic get weighed into that process for us.

13 So with that, that concludes my opening comments 14 and I'm happy to answer questions and be a part of the 15 panel. Thank you.

16 MR. THOMAS: I think mine got cut down to one or 17 two slides, as well.

18 COMMISSIONER PETERMAN: Well, we figure, we know 19 that each utility is different, but there are some 20 common threads across the room, so we figure we'll take 21 advantage of that.

22 MR. THOMAS: Yeah. Thank you for having us here 23 today. My name's JC Thomas, with San Diego Gas and 24 Electric.

My responsibility's in regulatory and

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legislative affairs. Part of my job responsibilities
 include increasing access to renewable power for our
 customers, specifically solar, and another part is
 making solar and other renewables sustainable from a
 rate design or customer stand point.

6 We are committed to reaching our 33-percent RPS 7 by the end of the decade. We're above 20 percent today, 8 wind, solar, biomass, and other sources. And we look at 9 the benefits of reduced greenhouse gases, a diverse 10 energy supply, obviously, the ability to build on the 11 landscape where suitable, where there's the least 12 environmental impact, partnering with the communities 13 where we do look at renewable projects, both large and 14 small.

And, of course, safety and reliability areabsolutely critical for our projects.

17 Some of the procurement mechanisms that I think 18 we're all familiar with is the standard contract 19 offerings, the RFOs that bring in the larger scale, the 20 RAM, which we're seeing the results of that now, and the 21 soon-to-be feed-in tariff.

22 And then, lastly, the net metering, something 23 that I'm going to talk about in the two slides that I 24 have because that's an important resource of renewable 25 power in our State that we don't believe is quantified CALIFORNIA REPORTING, LLC

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1 from an environmental stand point. We certainly don't 2 recognize it, it's not part of our RPS standard today. 3 We can go to the next slide. If you look at what our customers see in their bill, they don't see any 4 5 renewable power. They see a pie chart. And we 6 typically don't show it this graphic and this colorful, 7 but they would see their transmission and distribution 8 costs. 9 The other things, like nuclear decommissioning, 10 and public purpose programs, and then you have the 11 electric commodity, which is in the blue. 12 Maybe at some point in the future, as we see 13 more and more customers desire to have 100 percent of 14 their power come from renewable sources, that blue could 15 be shaded entirely green. 16 Our rates on the right-hand side are the effects 17 of AB1X, which is why you see the different pricing and 18 tiers. But, again, you don't see the reflection of 19 renewable energy. 20 And that's part of our transition and what we're 21 trying to advocate for, so that customers can see it 22 more transparent, what it is that they're actually 23 paying for. 24 We can go to the next slide. Some of the 25 proposed solutions that we've been discussing around **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 this issue is fixing a rate structure to get more 2 accurate pricing and promote customer-side renewable 3 energy sources. And also charge customers for the 4 services that utilities provide.

5 If subsidies are needed, we want to make them 6 transparent so that customers know what they're getting 7 and what they're paying for and that if there is a 8 subsidy, it could decline over time.

9 And then lastly, something that is important to 10 us and from our customer's stand point, is that they 11 want greater access to renewable sources.

We have a proposal before the PUC, called "Share The Sun," that would allow customers to elect up to 100 percent of their energy comes from renewable sources.

We hope that's successful and it becomes a pilot for us and, certainly, a model for the State.

17 Thank you.

18 COMMISSIONER PETERMAN: Thank you.

19 MR. RASBERRY: Good afternoon, Tamara Rasberry,

20 and I am the State Agency Affairs Manager for Sempra

21 Energy Utilities, representing SDG&E and Southern

22 California Gas Company.

23 So, my slides were abbreviated, also, so let me 24 just real quick talk about one of the renewable 25 challenges that our companies are working on right now,

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SDG&E and Southern California Gas Company, and that is
 biomethane and the biomethane production development
 within the State of California.

And so, as a result of the RPS, and AB 32, and the low-carbon fuel standard, and the demand for instate renewables, and the availability of the feed stock, and a potential for cap and trade development we see that this is a -- the time is right, now, for developing biogas within the State.

10 To date Sempra, SoCal Gas, and SDG&E have taken 11 on several biomethane projects. One was a onion waste 12 biogas for SGIP qualified fuel cells. It wasn't 13 interconnected, though.

We also had biosledge from wastewater plants.
We had RD&D to validate SoCal Gas testing methods and
prove viability of conditioning technology.

And one of the projects that we would like to highlight is the Point Loma Wastewater Treatment Facility, where we condition raw biogas for pipeline injection, and that is being delivered to the City of San Diego.

We do now own the conditioning plant, but we are providing the conditioning equipment. And it's my understanding that that is the only project of its kind in the State.

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1 But there are challenges to developing these 2 type of projects, large-scale projects. Obviously, this 3 has been mentioned in the previous panel about the permitting challenges. The on-site challenges from air 4 5 quality permitting, the local permits, the required air, 6 water and land use, a multi-layer permits, the feed stock aggregation, multiple feed stock for approved 7 8 rates versus groundwater issues, right of ways, multiple 9 dairy owners agreement required. Because at least for 10 dairy you need very large dairies to make the projects 11 economy -- the economy of scale, and engineering has to 12 be specific for that site.

And the perceived technology risk, of course, is the concern about the injected gas and that we have the SoCal Gas Rule 30, and PG&E Rule 21 related to gas specifications, specifically on landfill gas.

17 And then the limited demonstration projects that 18 are available to get funding from the financial 19 community.

20 We also see a shortage of incentives and that 21 was discussed at the last panel, also, available for 22 pipeline biomethane injection.

23 We see where the second panel actually made a 24 very good point, I forgot who it was, that the 25 incentives drive the market to development, but we'd CALIFORNIA REPORTING, LLC 52 Lengund Drive See Defed. Collegenia 04001 (415) 457 4417

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1 like to also see that for biogas.

2 And then, of course, the administration3 challenges.

Next slide, please. And so Sempra has developed
initiatives to help push this market to be available in
California. We are part of the GTI Study. I think
everyone, a lot of people at this table are part of that
study. To be released soon.

9 We have supported the regulatory policies, ARB's 10 rules to permit the offset for digesters. We are 11 advocating for the eligibility of RPS permitting that 12 was recently halted by the Energy Commission. We're 13 working on that with the legislation, possible 14 legislation, and also with the Commission. And, also, 15 some PUC definition of biomethane.

And we currently have a tariff that we will be proposing soon to the PUC, and this is our biogas conditioning and upgrading tariff. And this is a project where when the cost is less than the MPR of biomethane we would provide a tariff for biogas conditioning services.

And this would enable large customers to produce biogas and pipeline quality biomethane from their organic feed stock. This would facilitate on-site generation, natural gas fueling, and pipeline biomethane CALIFORNIA REPORTING, LLC

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1 supplies.

2 SoCal Gas would own and maintain the biogas 3 conditioning service and we would charge the customer a 4 monthly fee, under a long-term contract, for the 5 conditioning service.

6 This, of course, requires the PUC approval and 7 we're enlisting the support of local and statewide 8 agencies.

9 And I'll be available for questions about this
10 proposal and anything else about biomethane. Thank you.
11 MR. ULRICH: Hi, I'm Marc Ulrich from Southern
12 California Edison. We can stay on the title slide for
13 just a second.

I do want to add some credibility, it sounds Is like you got all the utilities here, and we don't always carry a lot of weight.

But one of the things that's interesting is we do play lots of roles. We are a renewable generator, we are a conventional generator, we're a grid operator. You could say, at least I'll get back at Aaron on this one.

22 Oh, by the way, Catalina mostly burns diesel and 23 then backup is oil.

24 But Edison has the biggest energy efficiency in 25 the U.S., it has the largest renewable portfolio in the CALIFORNIA REPORTING, LLC

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United States, so you could maybe stretch and call us an environmentalist. But we're certainly consumer advocates because half of the \$11 billion that we take in from our customers every year is for procurement, for electricity, the commodity, and that's just pass through. We're not -- our shareholders aren't making any money on the procurement.

8 So my main master, as a procurement guy, is my9 consumer.

And so what we're trying to do here is safe, reliable, affordable is what Edison's latest 10K was, and our mantra. The affordable part is my job.

I applaud that we're looking at all the benefits of renewables and making sure that we're not missing anything and my job is to go get those benefits for my customers, at the lowest cost possible, and to defend my customer so that they don't become a new tax base, or a subsidy, or a cross-subsidy platform.

So, some of the things that we talked about today or heard today shift to DG, to distributed gen, stay away from large-scale utility and transmission. That's happened, it happened, started about two and a half years ago, three years ago.

In 2008, in 2009 we launched a voluntary, small distributed gen feed-in tariff. We had some experience,

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1 we're evolving.

2 The Utilities Commission came out with a 3 proposed decision to revamp the crust into a new feed-in 4 tariff.

5 So, we get asked the question is it large-scale 6 utility or is it small-scale, local distributed gen, and 7 the answer is yes. You can't do -- you can't meet the 8 State's goals with one or the other, you've got to do a 9 little bit of both.

But one thing I want to make sure is I want to set the record straight, DG is not the panacea. It's the most expensive, the least efficient generation on the entire grid.

And so we'll go through some examples that there are benefits in this exercise is one of those things that help us justify more DG. And we're pro, both utility scale and DG.

And so it's our collective job to identify the benefits in certain energy policy, it's my job to get those benefits at the lowest cost.

21 We have -- we'll get a slide two, the question 22 for us was how do you do least cost, best fit in your 23 procurement? So, this is kind of explaining it.

24 We have generators tell us what they need to 25 cover their costs and we, Edison always pushes the

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1 principle of competitive solicitations. And the reason 2 is if the seller tells me what they need, that's 3 perfect, they're telling me a price at which they can 4 survive. So, I don't need a regulator, I don't need an 5 agency to set the prices for me.

6 Because what ends up happening when you set 7 prices, if an agency sets a price, if they set the price 8 too low, you get zip, nothing shows up and the policy's 9 worthless because nobody can build for what the price 10 is.

So what the tendency is, is to make sure that doesn't happen and then you set the price high. And then what my problem is with that is there's some money that I could have used to buy more renewables, or I could just put it back in the customer's pocket.

16 One of the things that we're really concerned 17 about at Edison is affordability. California utilities 18 have the highest rates in the United States. Our 19 industrial customer base, we lose 300 industrial 20 customers every year and we've been doing that for the 21 last two decades.

We forecast to lose another 300 customers every year for the next ten years. That's a problem. And so we've got to watch how we -- how we get these benefits.

25 Edison's perfectly fine with giving these

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1 benefits and whatnot, we buy into the benefits, but we
2 got to do it in a very cost-effective manner.

3 So the way we do that, when we're allowed to, is 4 we said, seller, tell us what you need, that's the bid 5 price. And all a seller needs to know to be competitive 6 is what their costs are. They don't need to know what 7 adder I'm going to put on for green jobs. They don't 8 need to know what adder I'm going to put on for locale, 9 they just need to know their costs.

Because a bidder will charge me the higher of their costs or what they think they can get away with. And if they think that I have to put an adder on something, or this adder has to be X dollars, all that bidder's going to do is take their cost and add a little bit to it because they know they may be uniquely situated that they can extract that from my customers.

So we ask the bidders what's your cost? The next thing we do is we add to that cost what is the wires portion of it. And there's a little -- there's a myth out there that says, hey, at the transmission level the customers ultimately pay for the transmission, but at the distribution level the generators pay for all the distribution upgrades.

And what really happens is people say, well,
that's not fair. In fact, there's a bill proposed that
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1 the distribution level equipment starts to get rate-

2 based, like the transmission, to get these even.

What really happens is they're all apples and apples because -- are you -- I'm still back on the prior slide. Is that my time check, is that my hook? You turn the slides on me and then I'm done.

So, the next thing we add to the bidder's price
is the transmission. We have time and delivery, we have
the bidder's price, and we have the transmission costs,
or the upgrade costs.

If they're connecting at the distribution level, that's embedded in their -- the wires costs are embedded in their bid price.

If it's at the transmission level, then I add it to their bid price so that I've got gen and wires at the distribution level, and I got gen and wires at the transmission level. It doesn't matter, I'm doing an all-in cost.

19 The next thing we do is we say, okay, that's the 20 cost of what the generation is, let's give it some 21 value. So, there's energy value, there's capacity or RA 22 value. There's other benefits, whether they're 23 ancillary services, or congestion relief if it's in a 24 local area, or a load pocket and then what's left over 25 is a renewable premium.

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So, one of the things we need to do is be careful about the adders that we're -- all the benefits we're doing, it's good to explore those and build programs so that you get those benefits. So, for example, in the most recent CPUC proposed decision in the feed-in tariffs, we're trying to find strategically located, which is what the State statute says in SB 32.

8 So, we're designing the program so that if 9 you're not near load, you're not eligible. We're not 10 putting an adder in so that we pay a generator more if 11 they're in local areas, and we pay a generator less if 12 they're not in local areas.

You know, economics, regulatory economics 101, if you're going to regulate something, you get to pick something. You get to pick quantity or you get to pick price, but you can't pick both.

17 So in cap and trade we picked quantity and let 18 the market do what we want to do. For subsidies we 19 picked price. And we don't know how much we're going to 20 get, but we've decided we're going to give a price break 21 for folks.

22 So, we need to be careful that we try to get 23 these adders and these benefits and then try to make the 24 customers actually transfer that benefit over to the 25 sellers, and that's what the last slide's about.

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1 So the last slide is, you know, there's a lot of 2 folks that have been walking the halls in Sacramento, 3 that says, hey, if there's \$20 of deferred value, you 4 ought to write a check and hand that over to the 5 generator.

6 And if we do that, then it's no longer deferred. 7 I'm really, at that point I might as well do the large-8 scale that requires the transmission.

9 So one of the takeaways is let's explore the 10 adders, let's make sure that the adders aren't 11 prescriptive. Let's make sure that they're not agency-12 based pricing and that an agency comes up and says the 13 adders going to be \$20 or \$40. I'd rather kind of 14 restrict the program to say, look, we want this benefit, 15 so go structure a procurement program that delivers that benefit. And we can do that, and we can do it cost 16 17 competitive, and all the extra money that we save, we 18 can use to buy more of that type of technology or that 19 type of benefit, or we can just put that money back in 20 the customer's pocket and, hopefully, not lose another 21 300 industrial customers each year.

22 So, I'll stop.

23 COMMISSIONER PETERMAN: Great, thanks.

24 MR. ULRICH: Thank you.

25 COMMISSIONER PETERMAN: Before we move on, I

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wanted to make a couple of comments and put some things
 out there, for particularly our representatives from the
 utilities to think about, so once we go through all the
 panelists we can come back and get your response.

5 And if you can go just for a quick second back 6 to Mark's second slide, with the bar graphs, with the 7 costs and benefits?

8 Now, I'll just say as a heads up, we are having 9 a workshop exclusively devoted to cost and retail rates, 10 so because there's so much to cover.

11 So, we're really going to focus on the benefits 12 in this one but, of course, appreciate that they are 13 interconnected.

14 So a threshold question for me, and I raised 15 this earlier in the initial panels, is we heard in panel 16 one about some of the benefits that -- for other 17 renewables, such as fire hazard reduction, that was 18 mentioned by a representative from Cal Fire, for 19 example, of collecting biomass.

20 And so a couple different benefits were 21 identified for different renewables and so moving 22 forward with the assumption that those are actual 23 benefits, although there's still some uncertainty around 24 the size and significance, a key question I have is if 25 we are to quantify and eventually monetize them, do you 26 CALIFORNIA REPORTING, LLC

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1 do that within our traditional procurement programs, the 2 ones we've discussed now, the RPS, or the RAM, or do you 3 establish separate programs to do that?

4 So, that's a threshold question I want to put 5 out there.

6 But I also wanted to list some of the 7 recommendations from different panelists from the last 8 two panels because, fundamentally, these would all be 9 things that would ultimately go into the procurement 10 program or would go into a separate program.

And I'll list them and I wanted you all to think about them and just give me your initial thoughts on them. In addition to they don't belong in the procurement program, let's take the position of if they were to be treated in a procurement program, what

16 aspects would be most important to see?

17 So, let me just provide some of those. So, one 18 recommendation mentioned was consider a health adder to 19 account for differences in health impacts.

20 Another one was to more or less consider 21 geography, that different renewables have different 22 benefits and different costs based on geography, so a 23 geographic adder.

Another recommendation was explore ways to monetize biomass.

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1 Another recommendation was to establish a 2 procurement mechanism for biogas. 3 Another recommendation was to monetarily award the displacement of transmission and distribution. 4 5 And then a final recommendation was to 6 acknowledge the difference between resources and technologies, and that certain technologies are more 7 8 appropriate for certain areas. 9 And for the most part I think it seems like the 10 RPS is a bit of a attribute -- an attribute-based 11 approach but, fundamentally, people bidding into the 12 process or resource-based. 13 And so just kind of looking at the, particularly 14 RPS procurement model, since it is the biggest, are 15 there different or better ways in which you could 16 acknowledge the different values, the different 17 technologies. So, some of these technologies do have 18 different impacts on water, on air quality, even if 19 they're using the same resource, such as solar. 20 So, I ask you to give some thought to that and 21 we'll turn back to Andrew. Thanks. 22 MR. MC ALLISTER: Thanks very much. You know, 23 the utilities always go first and then the rest of us go 24 last, and it just seems so oppositional. We ought to like do a, you know, I don't know boy/girl, boy/girl, 25 **CALIFORNIA REPORTING, LLC**

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1 something like that.

2	COMMISSIONER PETERMAN: We were just saying that
3	up here, I want you to sit maybe next to each other.
4	And I'll give a heads up, too, that we have a
5	fair amount of time for this panel, so once we've gone
6	through everyone's presentations and Kate's asked some
7	questions, I would encourage you and also ask for an
8	opportunity for you all to ask each other questions, and
9	then open it up a little bit to the audience before we
10	go to public comments.
11	MR. MC ALLISTER: Great, thanks.
12	So, it sounds like a lot of really interesting
13	stuff happened at the first panel, as I was not able to
14	go there, I was not able to be here for that.
15	And, Carla, your summary, or Commissioner
16	Peterman, your summary of the some of those sort of
17	most interesting comments actually mirror a lot of the
18	issues that I was going to try to get on the table. And
19	not that you've stolen my thunder or anything, but
20	never, never.
21	But, you know, I do think there is a big
22	question my name's Andrew McAllister, I'm Managing
23	Director of the California Center for Sustainable
24	Energy. We are some of you might know CCSE, we run
25	the CSI program and the SGIP program down in SDG&E's
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1 service territory.

2 We run the Electric Vehicle Incentive Program, 3 the CVRP for the Air Resources Board, and we do lots of 4 sort of program support, design, policy work based on 5 that.

And I guess the issue of, you know, whether our -- whether the ratemaking -- whether ratemaking is the appropriate place to capture all of these benefits is, I garee, the huge -- it's the big elephant in the middle of the room, in my view.

And the pressures on the utilities and the pressures on the solar industry are extremely different and there's a big gap between them right now. And a lot of that has been sort of jimmied open by the rate issues in the rate case environment.

But it is a fundamental question of, you know, agency-wise, where do different pieces of the benefit puzzle fit and what kinds of rigor we're going to put to those things, what kind of methodologies we're going to use.

You know, health is very different from economic development, and it's very different from home values, and it's very different from rates.

24 And so I think in order to really do this

25 properly you do need a cross-agency collaboration that's

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1 explicit, and that's intentional, and that is aimed at 2 monetizing those benefits in some way, the social 3 benefits. Because I think a lot of us around the table 4 believe that the social benefits of solar, generally, 5 are larger than what might be the purely technical, 6 avoiding distribution, capacity-based ancillary 7 services, and commodity benefits that are sort of more 8 easily quantifiable within our rate case setting.

9 And so if we're gonna -- if we're gonna move 10 down the road towards high penetration of solar at all 11 scales, right, not just utility scale, you know, medium 12 scale, or small rooftop. Say, solar, for example, and 13 all the other technologies that have different scales, 14 then we need to figure out this question.

The idea that -- well, so there are a lot of studies going on, there's one that we're working with SDG&E, and other stakeholders on, in San Diego. There's a number of studies going on in different service territories across the State on the benefits of distributed generation.

21 And in order to get something done in a 22 reasonable amount of time, with a consultant that's not 23 going to bust your budget, you really sort of are forced 24 down the road to look at a lot of the technical 25 benefits.

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1 And, you know, Craig has been working on, a lot 2 of the people around the table have been working on 3 this, in addition to the utilities.

So, I guess the concern then is if we end up 4 5 forced into, for practical reasons, to get a study done 6 that really is only sort of technical in nature, and yet 7 we know there are a lot of these social benefits that 8 are there, then how do we figure out a strategy for 9 giving them a value and then figuring out what sort of 10 agency initiatives, whether it's in this agency or 11 another, can tilt the playing field, or line the playing 12 field in such a way that it acknowledges it and allows 13 the market to use those benefits.

14 So, just in general terms that's kind of the 15 overall message I wanted to give.

You know, in retrospect I should have -- I use a slide quite often that is somewhat similar to the one that PG&E showed, where it's got one kilowatt all the way up to 100 megawatts plus, and with sort of small scale on up to large scale, and different programs, and how they fit in there.

22 Well, if you -- if the vertical access, you make 23 sort of the cost and then you put the scale along the 24 bottom axis, you've -- and you map the different 25 programs, you know, net metering over to -- you know, CALIFORNIA REPORTING, LLC

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one kilowatt to one megawatt, and then you can put the FIT in there from one kilowatt on up to three megawatts, and you put the RAM, and the utility procurements, and then RFOs along there you end up with a pretty jaggedlooking area graph as far as, you know, cost of resource. And, you know, it obviously tilts down as you go to the larger scales.

8 But the programs have different -- they're not 9 aligned and so the transition areas between net metering 10 and RAM, between RAM and RFO, the level of transparency, 11 even, from one -- you know, in each program in each, 12 essentially, procurement mechanism is widely variable. 13 So, I would say continuity, transparency, and reduction of uncertainty, which is the flip side of 14 15 that, is really needed in order for the marketplace to 16 step in and properly price their services in a way that

17 makes sense.

25

And just the last point there is that in particular with -- let's say that we're talking about the FIT these days, and if the FIT reference price has to do with the RAM outcome, then that's a kind of a difficult thing for the market to square, if the market doesn't actually sort of have full transparency on what the RAM actually look like in practice.

So, you know, you can understand that there's CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 some intellectual property issues around, you know, 2 maybe having full transparency with an RFO process, but 3 if you're expecting the FIT to function then you have to 4 give some transparency to that process or it's going to 5 be -- somebody said, previously, it's going to be DOA. 6 So, I think they're designing this plethora of tools that we have to get renewables into the 7 8 marketplace properly accounted for, properly valued, and 9 that really requires a lot of coordination effort among 10 programs, transparency. And in order to get the overall 11 value up, I think it's an interagency effort that 12 figures out ways, and we can talk about the specifics, 13 but to get the -- to allow the marketplace to monetize 14 across the board all those benefits, and not just within 15 sort of the utility rates, per se. 16 So, I'll stop there and then move forward with

17 questions.

18 COMMISSIONER PETERMAN: Thank you. A point that 19 was made earlier in the day, which you've hit upon, 20 Andrew, is that ratepayer benefits are not necessarily 21 public benefits, or public benefits are not necessarily 22 ratepayer benefits, and I think that is a good point to 23 acknowledge.

And what also became clear in the last panel, with a number of the different agencies and local

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stakeholders, is that just like benefits and costs are not distributed equally, neither is there an equal distribution of agency power or ability to finance. And I think that's, again, a part of the elephant in the room is that not every agency, or stakeholder, or county is able to provide some type of incentive or procurement mechanism.

8 And so the question becomes, then, considering 9 we all have different tools available to us, and we're 10 trying to solve a coordinated problem, who is in the 11 position to do what.

12 And another point that was made was that we can 13 think about uncertainty in three categories, and I'll 14 just say what was shared one more time, because you've 15 touched upon it, Andrew. And in terms of thinking about 16 the benefits or even the costs, the first category of 17 uncertainty is what do we feel confident we know? 18 So there might -- we might have a really good 19 sense of potential for T&D offset, for example, from 20 solar.

The second category is what's uncertain and inherently uncertain? That might be that value of national security, for example, that's not quantifiable. And the third is what's currently uncertain, but more analysis we can figure out?

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1 And so starting to think about each of these 2 resources from that perspective because, ultimately, we 3 can't monetize what we don't know.

And so in that category one, that's where we s tart and think is that possible? And in the category three, potentially there's some more to do. And in category two, maybe, we can't use those -- we can't get a firm number.

9 So, thank you and I'll shut up, now, because I'm10 not a panelist.

11 And, Nicole, you're on.

MR. MC ALLISTER: Sorry, Nicole. So, I'm not Nicole. One other thing, actually, I just wanted to give some props to. Well, we point out that the local jurisdictions are key in all this because it's not just about State agencies, it's also about local

17 jurisdictions.

Part of allowing value to matter is actually getting the cost of the installations and all of this stuff down so that we don't need to monetize as much to make a lot more solar go in, or a lot more of, you know, whatever the technology is.

And there's a multi-agency effort that's led by the Governor's Office, Wade Crowfoot over there is leading it, but it is looking at permitting for solar.

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And I think some of the people around the table are on
 that.

3 And then that was started and it was a good collaborative effort, and then the Department of Energy 4 5 came in with some resources to help a bunch of more 6 focused regional groups look at it, and those all got 7 folded together and there's now kind of a nice template, 8 I think, to keep looking at different barriers, not just 9 permitting, but interconnection, and some of the other 10 barriers that are going to allow us to get costs down 11 and make, actually, the need to dig maybe as deep, and 12 to lift that huge boulder of figuring out how to 13 monetize some of these secondary benefits a little bit 14 lighter.

15 So, I think those sorts of -- that's a great 16 interagency collaboration that could be kind of a -- you 17 know, a somewhat of a template here to use on this 18 effort.

19 MS. CAPRETZ: Thank you. My name is Nicole 20 Capretz, I'm with the Environmental Health Coalition. 21 We are an environmental justice organization in San 22 Diego, representing low-income communities of color. 23 And I'm also here representing CEJA, which is California Environmental Justice Alliance. And I know 24 25 Shana, from Communities for a Better Environment was **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 here earlier, we're tag-teaming.

2 So I will say thank you very much for inviting 3 us. My heart is already racing because it is hard to 4 hear some of these loaded terms, like costs, when we're 5 dealing with the communities that we represent.

6 I mean one of the questions I'd posed to the 7 utility right off is what are the costs of the existing 8 fossil fuel infrastructure that no one talks about?

9 Like the diminished social and economic impacts 10 to those communities, the health impacts that just get 11 kind of, I don't know, forgotten and left behind in the 12 dust?

13 So, hearing these very limited, traditional 14 definitions of cost and that they're just about, you 15 know, what's the impact to the ratepayer in their pocket 16 versus the larger societal cost is really, really hard 17 to hear. Especially because, you know, we work in those 18 communities and see the impacts every day.

And I think for us the other costs that we have to consider, what are the costs of not considering, in our existing renewable programs, the benefits that these programs could provide?

And so, what I just kind of listed in terms of the suite of benefits. We see existing programs not providing, but being sensitive to the fact that some CALIFORNIA REPORTING, LLC

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agencies, and methodologies, and tools don't exist, yet, and agencies have different levels of power, but equity in the distribution of benefits. Where are the renewables being installed? Who is getting the new, clean infrastructure?

6 Amory Lovins, from Rocky Mountain Institute, was 7 in San Diego last night. I think most of us who studied 8 environmental issues in college at all, I did way back 9 when, and he was already, you know, considered a guru.

And one of his points last night was that energy is typically viewed as a commodity but, really, it's infrastructure. And he's like, and people don't value it that way.

But, you know, we do. In our communities we see that who is getting the value of this clean infrastructure or is it going to help those communities be more resilient, especially as climate change impacts continue to arrive.

And so I really appreciated that comment and I think that's kind of a threshold question for us is who's benefiting?

Also, who's getting the jobs and, you know, some of the other kind of more mainstream environmental benefits that maybe aren't always included in some of these calculations, like the -- what is the

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1 environmental harm to the pristine desert areas that,
2 you know, even these clean generation resources are
3 causing? What is the benefits to the lack of new
4 transmission lines?

5 And another area I haven't heard, yet, is we 6 have these competing programs. You know, we're 7 intimately involved in the efficiency sector and there's 8 these super-ambitious, zero net energy building goals.

9 And, guess what, you don't get a zero net energy10 building without on-site generation.

And so, it's this lack of integration of these program metrics and goals that just escape us. And, again, it's kind of an odd reality that there's this huge need to get on-site generation, you know, in existing load areas, on existing buildings, and yet we never talk about it.

17 Instead, the renewable programs are more focused 18 on just build renewable energy for the least cost, best 19 fit, the least cost, best fit, however you -- again, to 20 me, a politically loaded term, but that's kind of the 21 provincial lens that it's viewed in.

22 So in terms of solutions, you know, of course we 23 have solutions. We think there should be -- you know, I 24 think Southern California said, you know, just what

25 benefits do you want, we'll create the program.

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Okay. We want benefits, we want green-collar
 job creation, especially in under-employed and
 unemployed communities.

4	We want a metric or some kind of screening
5	criteria outcome for environmental justice communities
6	that, again, they have been they've borne the brunt
7	of the negative impacts of the fossil fuel industry.
8	And I know, again, kind of highlighting what PG&E said,
9	well, you know, electric utilities, are they that much
10	of a problem?
11	But for the communities that live adjacent to
12	the refineries and to the power plants, they also live
13	next to the freeways. You know, they're probably where
14	none of you live, they're not where I live.
15	And, you know, we don't know, it's that
16	diminished, again, economic and social opportunities is
17	real, it's tangible, it's quantifiable, and also with
18	the health impacts.
19	And so we think it's really important that those
20	communities that have kind of suffered the most from the
21	old fossil fuel industry deserve the right to be first
22	in line to get the benefits.
23	Again, what I've already indicated about, you
24	know, the overall lack of integration of demand
25	response, efficiency, conservation, renewable energy
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and, you know, making sure that renewable energy
 programs are meeting the long-term energy efficiency
 strategic plan goals, I just don't see any nexus there.
 Obviously, there is a nexus, I haven't seen it in the
 design of renewable energy programs.

6 This is kind of a creative one, but it's the 7 public health benefits. And I think, you know, what --8 I've read but, you know, but I'm not really familiar 9 with, but CARB and Department of Public Health, 10 apparently, are doing some study trying to quantify, 11 under the Cap and Trade Program, what are the health 12 impacts to programs that reduce carbon emissions.

13 And so I think they're trying to be really 14 creative and innovative in their thinking and saying, look, if we got more clean, green infrastructure in 15 16 certain communities, if you got them to have a job where 17 they're not going to the refinery every day, they're not 18 going to the shipyard every day, but they're actually 19 installing solar panels what economic impact would that 20 have on that person, and in that community, if they 21 actually see some of the clean infrastructure? 22 And so, again, I'm not -- I don't really know 23 how this is manifesting, but I think it's worth 24 exploring.

25 And this is -- this is the way -- you know, now **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 we're definitely getting outside my comfort zone. But I
2 know, you know, a lot of times we hear in the utility
3 message the community is not -- well, if you want
4 renewables, that's fine, but we got to build more
5 peakers, and we're certainly hearing that in San Diego,
6 with SDG&E.

And there's something missing there, again, with the integration of demand response, and storage, and some of the newer technologies, but that doesn't -- one doesn't have to immediately equate with the other. And I think, you know, we'd like to see some more conversation development around there, but I'm definitely not the expert on that.

And then another solution we like, we want the Governor's program -- you know, I know some utility members don't want a carve-out, but we do.

And I think it's consistent with the other major energy program goals, like energy efficiency, that we want building scale solar programs, and we think that should be a carve-out within the DG umbrella.

That, you know, again, if we're ever going to meet these ridiculously ambitious zero net energy goals, we've got to have more programs that focus on getting on-site generation.

25 And then our final solution, which is a bill we CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 have this year, and so we do have AB 1990, that's in the 2 Legislature, that would be focused on getting solar 3 installed in these environmental justice communities, 4 and making sure that our community members are the ones 5 who are doing the work to install the solar panels. 6 So, again, kind of piggy-backing on the idea 7 that CARB and Department of Public Health seem to 8 already get on some intuitive level that, you know, 9 there is a tangible, economic, health and social benefit 10 to these communities that are under-served and 11 disadvantages, that if they can participate meaningfully 12 in a green economy. 13 And that's what I got, thank you. 14 COMMISSIONER PETERMAN: Thank you. Just one or two points because, overall, what I like to accomplish 15 16 in a renewable strategic plan is that over the last 17 year, in particular, as we've been looking at 18 renewables, and I think as we've all discussed these 19 issues there were certain things that are said and you 20 think, okay, it's being said, but is it true, are we all 21 operating from different assumptions? 22 You know, for example one that I heard a lot, 23 which is one of the reasons for this workshop, was that 24 there are these other benefits to bioenergy, in 25 particular, that are not being realized. CALIFORNIA REPORTING, LLC

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1 So another point I hear often, and Nicole, you 2 were alluding to this and it came up in the panel 3 earlier, was the installation of solar in communities 4 that have been exposed more or have more power plants 5 sited there, and almost the assumption that that solar 6 would displace those plants.

And what we heard in the first panel was that 7 8 that may not be true, that specifically, one, because of 9 local liability issues that you'll have to keep some 10 thermal generation there. But also, I think there were 11 statistics cited that renewables displace about 50 12 percent of the time in-state fossil fuels and 50 percent 13 of the time out-of-state, you know, give or take, and 14 that it really does depend what's on the margin.

And so, you know, things like that, you know, that's almost fact, right? And we've got the right group of people in here to help us clarify some of the facts.

19 So, I think that's going to be useful to clarify 20 some assumptions. Just like, for example, the point 21 that Aaron made about where the emissions are coming 22 from.

23 The other point I wanted to raise is that 24 another recommendation that came out, which I think 25 perhaps many of you could agree on, potentially, is the CALIFORNIA REPORTING, LLC

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1 electrification of the transportation sector in terms of 2 both -- as well as the decarbonization of the 3 electricity sector in order to address some of the even larger drivers of air pollution in under-served 4 5 communities. And, as well, it wouldn't hurt your bottom 6 line, to be honest, utilities, right? So, I figured you 7 could get together on that. So, I just wanted to put a 8 couple of those out there.

9 MR. KELLY: Thank you. I'm Steven Kelly, I'm 10 the Policy Director for the Independent Energy Producers 11 Association, and within that Association we have a full 12 array of renewable developers and non-renewable 13 developers.

In the renewable portfolio it's the utilityscale wind, biomass, solar.

But also, people are now moving into the smaller to mid-scale ranges, and the smaller DG ranges as market signals are telling people to move into that kind of a sphere and invest money.

I'd like to address a couple of things. One, I wanted to start off with just of addressing this issue of monetization in general, and benefits, and then speak a little more specifically about kind of how you approach that.

25

And I actually participated in the PUC's

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scenario workshop, yesterday, and there's -- I have some
 comments on that, that I'd like to bring to the table.

And then maybe provide you with some -- from a commercial side of things, some key factors that we look at, that are really the factors that drive the investment that result in the development that you all want.

8 Now, first, on monetizing benefits and, you 9 know, this was set up to discuss the quantification of 10 those things we know, and the non-quantification of 11 those things we don't know.

And I'm just here to say, and I've been doing this for a long time, been around since '94 doing renewables stuff, and the promise of accuracy and precision in this kind of analysis is a mirage.

We're never going to get there. And I use the term "mirage" purposely because it's one of those things that as you walk toward the mirage, it always seems to be receding, and you are never going to achieve reaching that point.

21 We're never going to have precise information. 22 And one of the examples of that, E3 did their, what I 23 thought was a very sophisticated study a couple of years 24 ago, in the carbon world, and before that study hit the 25 street, it was out of date pretty much, because of the

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declining prices in some of the commodities that they
 were using. It was a very good study and I applaud
 their work on that, but it was out of date.

You will always be out of date in terms of trying to quantify the benefits of these programs. And as you strive to achieve this goal, I'm just hopeful that we don't delay the implementation of the programs we have in place, in the expectation that we're going to get some perfect answer down the road.

10 Yesterday, at the workshop, there was a lot of 11 discussion of the perfect integrated resource planning, 12 as if we could achieve that. We've been talking about 13 that for 20 years and we never can achieve that.

So, I really caution you, as policymakers, to be -- it's not necessarily don't look at the numbers, but don't wait on some of the policy implementation if pending the promise of having some perfect numbers that you don't already have today.

19 I would rather see a standard of decision maker 20 which says, you know, what we have is sufficient or 21 adequate to make reasonable decisions based on the best 22 evidence at the time we make those decisions.

That will allow decision makers to move forward in a timely manner to get the infrastructure that needs to be put in place, now, for the future world that

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1 people are talking about in 2030, 2015, because that 2 investment has to occur today.

And it has to occur based on some assumptions. And yesterday, at the PUC workshop, there was a lot of discussion about, gee, should we do top down or bottom up analysis?

And my take away from that was that the people who feel they got harmed in what I call the bottom-upleast-cost-best-fit analysis, we're now saying, well, that doesn't work very well, let's do top down, as if we were going to throw away that whole approach after we spent four or five years working on that, that least cost, best fit technique.

14 It's getting more sophisticated every day, it's 15 getting more useful to the utilities every day. I'm 16 just hesitant to throw it out and do what we've termed 17 top down, now that we're two-thirds of the way across 18 the stream.

19And I've seen California do that repeatedly over20the last 15 years, so I'd just caution you about that.

I look at bottom up analysis as essentially the least-cost-best-fit methodology that we've been working on.

24 For five or six years, now, people have been
25 asking the utilities, because of the law, to acquire the
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1 least-cost-best-fit resources.

We have some arguments about transparency there, we'll continue to have those, but that is in the statute and they've been developing, and we've been developing statewide tools to help get to a better answer in that regard.

7 And that's all well and good, and I hope we
8 continue to work on that.

9 But the other important factor in developing 10 these programs is what I'm going to call, what we 11 usually use, is the top down approach.

12 And the top down approach is something that 13 we've been doing in this State for a long time, it's 14 called the RPS, it's called the CHP program. It's 15 called all the legislation, and all the regulatory 16 rules, like the loading order that have sent signals to 17 the marketplace about what you kind of want as we 18 perfect these things.

And they've actually been fairly efficient. So, we have a top down approach, it silos a lot. I have some concerns that we continue to silo the RPS down into finer and finer pieces to meet every technology advocate's desire there, so I have that concern. But we've got that.

What's really missing in the decision making CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 process, if anything is missing, is the perspective from 2 the top that what we are doing with renewables is buying 3 insurance. We're not only buying energy capacity, and we're not only buying all of the things that people have 4 5 been quantifying for 20 years. I mean you can find any 6 study that quantifies the health benefits, quantifies -all of that stuff's been done, up and down, for 15, 20 7 8 years.

9 What we're really doing is buying some 10 insurance, in addition to all of the benefits that you 11 can quantify.

And that requires -- and that is a measure or a signal to the leadership to step up, in a leadership role, with foresight and make some decisions about procurement, for the infrastructure that's needed to ensure against certain outcomes that you don't want to happen, but could happen down the road.

18 And I'll throw out a couple of examples. I had 19 an opportunity to look at an organization, who I'm not 20 very familiar with, which is called Climate Central. 21 And they mapped out, globally I think, but certainly for 22 the U.S., the impact of sea rise around the country. 23 And you can go into their dataset, on their 24 website, and you can put in the amount of feet that you 25 want to see mapped out, and it will show you what the **CALIFORNIA REPORTING, LLC**

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impact is of sea rise at two feet, four feet, up to ten
 feet, and maybe more.

And what you can see is that there is a huge impact in California, let alone the country. And the places that get impacted the most with the sea rise are places that you wouldn't necessarily think of, right out of the bat, for California. Alameda County, Stockton, Orange County, those places are the ones that get hit, first, with global sea rise.

10 So, you know, you can't quantify the impact of 11 that. You're never going to be able to get a handle on 12 that.

What you do know, as a policymaker, that the infrastructure to help mitigate that outcome, those decisions have to start getting made, now, to help do that. And you're never going to have a firm answer about the value of that.

So, that's just one example that I would point you to, that is non-quantifiable, and it's certainly important in developing the policies that California's been developing over the years, that have resulted in the RPS and the other programs we have.

Electric vehicle infrastructure is another one. If we're going to use the RPS resources, particularly the wind, as a fueling source for electric vehicles,

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which I think we all think is a cool thing to fit
 together, well that infrastructure, those decisions have
 got to be made before the cars are there. And that's
 what we're trying to do.

5 You can't quantify the benefit of that, though, 6 we don't know how many cars are actually going to be 7 there. We don't know how many stations we need right 8 now. But we do know that there's a good initiative and 9 a good reason for moving forward.

10 So, I raise that now because I'm concerned that 11 we're, as a State, just getting mired in data analysis 12 and that leads to policy paralysis, which is something 13 that I'm not in favor of.

From a commercial perspective, I just want to point out a couple of things, and I think this will feed off some of the things that were heard earlier this morning and, certainly, some of the things the utilities have talked about.

You know, while the State agencies are talking about a lot of cool things they're trying to do, and so forth, the big driver for infrastructure development in California, today, are the procurement decisions made by, primarily, the utilities.

24 That's where the money's going, that's what 25 drives the investment decisions.

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So, if you want to have any impact, today,
 that's where it's got to go.

And, you know, there was a good discussion this morning about the fire suppression value of renewables. If I'm doing a new biomass facility, I'm going to want a new, 20-year contract with the utility, and I need to know that that is a safe and secure revenue stream.

8 The fact that the fire department or somebody 9 else has got \$100 for me today isn't going to drive my 10 investment, because I'm going to be worried that that 11 money's not there in five years.

So, there's a huge de-link there between what those agencies are talking about, all good things, but what the investment community actually needs to spend the money to build stuff. So, I'd just point that out.

What we really are looking for is more

17 transparency in what the State or the utilities want, 18 when and where they want it.

16

19 Those kinds of signals, in advance, are the 20 things that are going to drive development decisions and 21 procurement decisions.

22 And if you come up with a conclusion that you 23 want all the renewables to be built on used lands, not 24 pristine lands, then send that signal out. What you'll 25 probably find is that nobody can built anything because CALIFORNIA REPORTING, LLC

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it's very difficult to negotiate with, you know, 50 or
 100 different farmers in Butte County to try to get the
 acreage that you want to build your project. But that's
 something you could do.

5 So, the transparency of what, where and when you 6 want things, and what the utilities are selecting in 7 their bid protocols is a fundamental thing that at least 8 we've been working on, to make more known to developers 9 in advance so they can plan projects to meet those 10 needs.

11 And then, third, as I had indicated, monetizing 12 these benefits, if the -- what I'll call these adder 13 benefits that people have been talking about, that are 14 well talked about, and well discussed, if we can't figure out a way to link those to the primary factor for 15 16 developing projects, which are the procurement decisions 17 right now, of the utilities, then it's probably not 18 going to be as helpful as you would like.

19 So, I will leave it to that and look forward to 20 Q&A.

21 COMMISSIONER PETERMAN: Thank you very much.
22 And I agree with you, Steven, in particular about
23 avoiding trying to get the numbers perfect.

24 One of the general questions I asked earlier was 25 want to get a sense of overall, in orders of magnitude,

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1 the size and significance of some of these benefits.
2 Because, fundamentally, from a public perspective, if
3 they're not changing the overall relative share that we
4 would have from different renewables, ultimately not
5 necessarily something that we have to delve into thus
6 far.

And so want to have a sense of business, are we
not accounting for something big that otherwise might
change how we go about doing overall deployment.

10 And then, also, your point, too, about not 11 necessarily waiting to get the numbers accurate in order 12 to monetize or move forward with policy. Again, that's 13 true. I mean there's nothing that -- we assign prices 14 and dollar amounts to a lot of things that actually 15 don't reflect their -- we don't know their underlying 16 costs or value.

We have a dollar price for carbon allowances,
and we don't know what the price, the cost of carbon
will be ultimately for climate change.

20 And so I think we've got to also be cautious not 21 to require more out of a quantification of benefits,

22 than we do out of a quantification of cost. So, that's

23 just a couple points there.

24 Craig.

25 MR. LEWIS: Great. Thank you, Commissioner

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1 Peterman.

2 When I first started to think through this 3 presentation, I thought I want to really look at this 4 from the perspective of maximizing ratepayer value. And 5 when I do that, I come to the very specific conclusions 6 that ratepayers get maximum value by avoiding 7 transmission investments and investments in new fossil 8 backup technologies, peaker plants. 9 And I further thought about it and said what do 10 California ratepayers truly value? 11 Well, you could say that -- I'm a California 12 ratepayer and I definitely value a pristine environment. 13 And one of the things that ruins pristine environment 14 more than almost anything else, is looking at a place 15 that has nothing, except a big transmission line running 16 through it. That is a soiled pristine environment. 17 California ratepayers also value innovation and 18 innovation pays off in a lot of ways. It creates jobs, 19 it creates superior options for customers, it provides 20 lower costs. 21 The analogy for the energy market is the telecom 22 market, because the telecom market is about 30 years 23 ahead of the energy market in terms of transforming 24 itself. 25 And the telecom market got transformed by two **CALIFORNIA REPORTING, LLC**

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1 things. It got transformed because MCI was able to
2 break the stranglehold that AT&T had on the long3 distance market in the United States, and that softened
4 AT&T's ability to defend itself for additional policy
5 innovation, that led to the breakup of the AT&T monopoly
6 across the United States, broke AT&T up into the Baby
7 Bells.

And that led to a massive transformation of the telecommunications industry. We want, from 30 years ago, to a scenario where you had to rent your home telephone from AT&T. You could not even own your home telephone, believe it or not. Lots of people in this room aren't old enough to remember that.

14 But fast forward 30 years and we've got a 15 situation where you've got Google Talk, and Skype. You've got three cellular carriers, or four, whatever it 16 17 is nowadays, multiple cellular carriers to choose from. 18 And if you're under 20 years old, your most 19 common form of communication is probably Facebook. 20 So, we have absolutely transformed the 21 telecommunications landscape. The costs are practically 22 zero, compared to what they were, you know, again 23 depending on how old you are. You used to spend 20, 30 24 cents a minute to call across the United States, today 25 it's free. And you can call across the world for almost **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 free nowadays.

2 So, innovation, California ratepayers definitely 3 value innovation. They also value superior service, and I'll talk a little bit more about that in just a moment. 4 5 And at the end of the day, ratepayers definitely 6 value cost savings. And cost savings doesn't mean it needs to be cheaper today. Right, and that's what 7 8 everybody seems to get locked in on is that it has to be 9 cheaper today. 10 No, it has to be cheaper over time, over the 11 lifecycle of the solution that we're talking about. So, if you could, to the next slide. And by the 12 13 way this slide, I'm going to walk through it a little 14 bit, this really enforces a lot of the concepts that Amory Lovins talks about, and he's been mentioned by 15 Nicole, he was mentioned this morning by Chairman 16 17 Weisenmiller. 18 And Amory Lovins really has a good view of the 19 world. And, basically, what Chair Weisenmiller said 20 this morning was that Amory has done the analysis for 21 the various scenarios and has basically come to the 22 solution that there's not that much cost difference. 23 But there is a big difference in that there's not that much cost difference TODAY. 24

25 If you look at it over time and you get some of **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 these new solutions deployed, and you get some scale, 2 the costs come down. That's just how economics work. 3 And so, over time the ratepayer's going to be far better served by going to the future that we 4 5 actually need to get to. 6 And what this chart -- and, by the way, Amory 7 Lovins is on my board of advisors, so I'm very proud of 8 that fact and he's doing some tremendous work out there. 9 What this chart shows is a little bit of what 10 Commissioner Peterman was hoping for, which is some 11 really good quantification. And this chart has some 12 really specific, easy-to-verify quantification, like 13 today's transmission access charge, which is about 1.2 14 cents per kilowatt hour. 15 In other words, every kilowatt hour that is 16 interconnected to the transmission, by the time it goes 17 off and serves a load it will have a 1.2 cent per 18 kilowatt hour transmission charge associated with it. 19 That's huge. It's a huge percentage of the cost 20 of retail energy. 21 Now, what happens in the business as usual case, 22 if we let the utilities and other folks, who probably 23 want to just keep doing business the way that they've 24 done it for the last hundred years, because it's very 25 profitable for them and the market's working for the **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 utilities.

And I don't argue with them for that. Right,
anybody would want to just continue to maximize the
situation for themselves.

5 so, if we continue on the business as usual 6 case, which is where you have central station generation 7 and you transport that remotely generated energy to 8 where you actually need it, which is where people live 9 and work, you're going to be basically following the 10 gold line. And the gold line is at the top of these 11 screen wedge, it's the business as usual transmission 12 access charge growth rate.

13 Now, we're making some assumptions here in terms 14 of where that transmission access charge is going. But if you consider the fact that this chart is showing it 15 going from 1.2 cents to 2.7 cents over the next 20 16 17 years, and at the same time you consider the fact that 18 the transmission access charges have increased by more 19 than three times over the last seven years, this is a 20 pretty accurate chart.

21 And it's verified by a number of the municipal 22 utilities throughout the State of California that do the 23 analysis on what those transmission access charges are 24 going to be. They pay the exact same transmission 25 access charges that all of the utilities have to pay 26 CALIFORNIA REPORTING, LLC

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1 when they download -- when they down convert 2 transmission energy into distribution energy. 3 So, essentially, the transmission access charges, alone, are a huge, huge amount of money. 4 5 The State of California has been screaming about 6 this high-speed rail having a price tag somewhere in the \$100 million range, and it's gone down to the \$70 7 8 million range. 9 Well, the amount of money that California 10 ratepayers will pay on transmission access charges over 11 the next 20 years, that they could avoid by going to a distributed generation, and intelligent grid solution, 12 13 where we're balancing energy generation at the local 14 level, the amount of money differential that we're 15 talking about there is \$80 billion. 16 And the reason that we don't hear Californians 17 kicked and screaming about it is there's no transparency 18 in this. Ratepayers have no clue that they're getting 19 jammed, they're going to get jammed for \$80 billion over 20 the next 20 years, if we let folks, you know, the 21 utilities just continue on the business as usual 22 pathway. 23 Now, the other extreme, the blue line, is where 24 we don't invest in any new transmission, we continue to 25 maintain the existing transmission that's out there. **CALIFORNIA REPORTING, LLC**

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And there's a lot of it, there's a lot of transmission
 out there.

Now, if we're generating on the whole -- on the distribution grid, instead of the transmission grid, we don't need to keep buying, the paying for investments in new transmission.

We do need to invest in energy storage, demand
response, electric vehicles, which are kind of energy
storage and demand response combination.

10 And then we need to invest in the systems that 11 allow us to locally balance the supply and demand of 12 energy.

13 The Clean Coalition likes to refer to that as MC 14 squared, which stands for monitoring, communications, 15 and control. We chose MC squared because it's a play on 16 Einstein's famous formula for energy.

17 So, we've got a lot of potential here. There's 18 a boatload of money that can be used to either save 19 ratepayers money, and/or to invest in that distributed 20 generation, plus intelligent grid future, which is 21 really where the California ratepayers are going to get 22 the best value in terms of pristine environments, 23 investing in innovation, investing in cost savings over 24 time, and getting superior service.

25 Next slide, please.

CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 COMMISSIONER PETERMAN: How many slides do you
2 have, Craig?

3 MR. LEWIS: Just this is the last one that I was
4 going to --

5 COMMISSIONER PETERMAN: Just checking.
6 MR. LEWIS: Yeah. I have a bunch of extra
7 slides, for people who want more information, but you
8 can present it your own.

9 This slide, basically, is not showing up 10 properly. What's supposed to be showing there is that 11 if you look at the demand curve for energy over the 12 course of a day, it's not this nice, clear -- oh, there 13 we go.

14 So, what this slide is supposed to be showing is 15 that in the course of the day, you know, if you look at 16 one day you see this kind of sinusoidal curve for where 17 demand for energy peaks in a typical day.

18 But what that really smoothed out curve doesn't 19 show is that we actually have a very jagged situation 20 going on in there. And that's, this look is basically 21 down to the one-minute level, versus a 24-hour period. 22 And when you start looking at things at a one-23 minute level, you realize that having significant levels 24 of compensation going to fossil backup, you know, the 25 traditional peaker plant, is really not an optimum value **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

for California ratepayers. And the reason is that half
 of the time is that fossil backup is actually
 exacerbating the problem.

So, what this is looking at, frequency
regulation, and what you want to be doing when your
demand is above that solid, that straight brown line,
you want to be basically reducing the amount of energy
that's on your system. And when you're below that line,
you want to be increasing it.

10 Now, fossil generation can't provide any value 11 to ratepayers in this sub-minute situation because it 12 takes about ten minutes even for natural gas to ramp up 13 and down.

Energy storage, demand response are nearly instantaneous. The value provided to ratepayers is significantly higher from getting the frequency regulation and lots of other ancillary services from solutions, intelligent grid solutions, like energy storage and demand response.

And with that I'll just move on and I'll just say one more thing, because this ties up with some of the things that Steven said, and Nicole, and others.

The solutions really come down to procurement. I agree with Steven when he said we've got to make sure that we're buying the right technologies.

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1 We also need to make sure that when we're 2 talking about generation technologies -- so when I'm 3 talking about procurement, I'm not talking about just 4 generation, I'm also talking about energy storage, and 5 demand response, and the systems that balance energy 6 locally.

Aside from procurement, we have to solve
interconnection. Interconnection is so broken in
California, it is not even funny.

10 In fact, if ratepayers knew what was the 11 misappropriation of time and money that is being made on 12 them, because of the way the system is broken, they 13 would be crying.

14 So, what I'd like to bring as an example, with respect to interconnection, is that Sacramento Municipal 15 Utility District, right, has served the energy right 16 here, they did interconnection studies for 100 megawatts 17 18 of their feed-in tariff program projects. Two guys, two 19 months, they got all those studies done, two guys, two 20 That same study, a single study for a typical months. 21 investor-owned utility in California is two years, a 22 single study. A tremendous bottleneck to the process of 23 procuring new, wholesale distributed generation and we've got to solve that problem. 24

25 And by the way, Marc, that's what that bill CALIFORNIA REPORTING, LLC

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1 does, the one that you referenced. The bill that Marc 2 referenced, I think it's AB 2350, it basically -- or 3 2390, it basically says if the utilities are planning to upgrade their distribution grid in a particular area, 4 5 within the next five years, and a wholesale DG project 6 is going to get sited there, and there's some upgrades 7 that need to happen that the utility would have made 8 anyway, within the next five years, the utility pays, 9 which means it's going to be rate based.

It is 100 percent fair on the ratepayer and it is a huge solution to making sure that we help overcome this interconnection problem.

And then the last thing that I'll put here is that specific solutions, we absolutely need to include locational benefits.

16 The proposed decision for SB 32, the statewide 17 feed-in tariff bill, that Marc mentioned, from the staff 18 decision -- or the staff proposal to the proposed 19 decision, they removed locational benefits.

Locational benefits is absolutely a pure market signal so that generators can figure out where to go put those projects. And for whatever reason, the ALJ,

23 that's in charge of the SB 32 decision, they proposed to 24 remove the locational benefits.

25 The locational benefits were worth up to 8 cents CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 a kilowatt hour. A huge market signal that makes sure
 that we get things right and we don't have distorted
 markets like you were complaining about.

4 So, we've got to make sure that we get 5 locational benefits properly valued and included in the 6 procurement programs.

8 COMMISSIONER PETERMAN: Thank you. Craig, 9 you'll be happy to know that we do have a workshop on 10 interconnection coming up. So, a lot of the topics that 11 you all really can't help but delve into right now, at 12 some point I might say to you we've got an entire day 13 devoted to that. But, yes, point taken.

I did want to ask a quick question from one of the utilities, following up on the transmission and distribution point.

17 One of the -- I believe it was Warren who might 18 have raised this point earlier, that although avoided 19 transmission distribution can be a benefit, for example, 20 with solar PV, when talking with -- it's an anticipated 21 benefit but sometimes it doesn't materialize, because 22 sometimes you still need to build, or expect to build 23 that T&D because you're uncertain about how much solar 24 you'll actually have, for example.

25 And I just wanted to get your thoughts or if you CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

⁷ Thank you.

1 could give us some feedback about to what extent you are 2 making decisions in terms of T&D expenditures based on 3 expectations, or even what's already been built around 4 solar or, you know, can you -- is this an area where you 5 actually can control one of the benefits from? And so, 6 welcome your thoughts.

7 MR. ULRICH: Yeah, this is the tough part. We 8 totally agree with Craig with regard to where the TAC 9 charge is going, and all this additional transmission. 10 This transmission, if we can avoid those costs, that's a 11 good thing.

12 And that's why we started, three years ago, 13 focusing on 20 megawatts and below, locally distributed. 14 And so it is a big driver to us, we always 15 include it in the cost whenever we make selections. 16 If I've got two projects that are both \$100, but 17 one comes with \$20 more of transmission, it loses, the 18 one who doesn't wins.

19 So, we use it every day. As Steven said, we're 20 using it every day in our evaluations and trying to 21 minimize these types of expenditures. So, it's a big 22 driver.

23 MR. THOMAS: Yeah, JC Thomas, again, with SDG&E, 24 just a couple of thoughts on that. One, from the things 25 that we're looking at, you know, the more generation of CALIFORNIA REPORTING, LLC 1 distributed power you have will require a more

2 investment in our distribution system

3 We have in our rate case, I think, around \$57 4 million for Smart Grid, with a package, a plan going 5 forward to continue that investment, to deal with the 6 issues surrounding distributed generation.

Also, we've actually made an offering to a
customer, as an alternative to providing a distribution
line in a high fire-risk area, let's put him on a solar,
with self-generation, battery storage.

11 The customer declined. We were actually 12 advocating for it. It was a case where the risk was 13 high, our preference was to have some alternative 14 solutions for them. So, that's another issue that we 15 deal with and that is the sacrifice or the tradeoff that 16 the customer wants, in that case.

17 MR. JOHNSON: I would just add that when you 18 look at the way that utilities do planning for the 19 system there's really one issue that's driving it. 20 Obviously, cost is a big concern, we hear about cost 21 from our customers.

But the thing that we really, really hear about is reliability. And at the end of the day, when you look at the electricity grid, it's designed to be highly reliable and it's redundant.

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And so, you know, there's a couple of factors that play in here. The first is, you know, to the extent that solar would potentially offset distribution investment, our peak load is at six o'clock at night and it's getting later. It's moving back, it was 5:00 ten years ago, it's moving back.

Solar isn't helping us there, so the system is sized to meet peak load, so it doesn't particularly help there.

10 The other thing is that distribution planners at 11 utilities, because reliability is so important, there's 12 a very -- you know, the way that it's done is basically 13 on a deterministic basically. Basically, when you're 14 doing resource planning, you're looking at what happens if I lose my biggest resource, can I still meet load? 15 16 And so it's not a probabilistic process, we're 17 not looking at what's the likelihood that that happens, 18 we're just saying if that happens, can I still keep the 19 lights on?

And so when you do that, you start turning off the -- what are considered the biggest contingencies, the biggest thing that if something goes wrong with that, I turn it off.

And so when you do that kind of planning, if you look at systems and you put distributed generation on,

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1 the first thing a planner does is say, okay, can I still 2 meet load if I turn that off?

3 So, it doesn't necessarily help with a very 4 conservative approach to reliability. And I think it's 5 something that gets missed in this conversation around 6 this, that somehow the system is designed to operate on this razor trigger of optimal efficiency where we can 7 8 just put in the exact amount of whatever we need in the 9 system. No, it's done on a much more bulk basis and on 10 a much more conservative basis. 11 COMMISSIONER PETERMAN: So then I quess 12 generally it's fair to say that at this point the 13 utilities are not avoiding transmission distribution 14 with the introduction of distributed generation, to date. Would that be correct? Okay. 15 16 MS. CAPRETZ: And my only follow-up question to 17 the utilities is so how is UCSD 93 percent off the grid 18 successfully? So, like how did they create that micro-

19 grid successfully, if it seems so insurmountable, the 20 opportunity and ability to do that?

21 I mean it just seems to me there are examples 22 that --

23 MR. THOMAS: They're connected to our 24 transmission system, they get transmission system from 25 us. And what they've done on their side, I haven't CALIFORNIA REPORTING, LLC

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gotten into great detail of what they're doing with
 their micro-grid.

3 But those are some of the things that we're 4 exploring, too, both in Borrego Springs, the project 5 that we have there, and then also a development in 6 Mission Valley to look at those very issues. How can you reduce the size of your distribution 7 8 system, your capacity to serve by meeting the needs with 9 storage, fuel cells, solar, or other techniques. 10 But it's building it from the ground up, not 11 retrofitting an existing development. 12 You know, we have over -- you know, thousands of 13 circuits, distribution circuits throughout California 14 that are already built, the costs are there to meet the reliability needs at 6:00, 8:00 at night when our 15 customers come home. Adding in solar or battery storage 16 17 could help in some cases, but not in every case. 18 COMMISSIONER PETERMAN: Thank you. 19 MR. THOMAS: Thank you. 20 COMMISSIONER PETERMAN: Because I want to turn 21 to our next panelist, because we want everyone to have a 22 chance to go through. So, that's why we -- this panel 23 goes to 4:30 because we knew there was going to be a lot of great discussion. 24 25 So, moving along, Lori, thank you for being **CALIFORNIA REPORTING, LLC**

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1 here.

2 MS. SCHELL: Thank you very much for the 3 invitation to be here. My name is Lori Schell, I'm affiliated with UC Irvine, as well as Empowered Energy, 4 5 which is actually a Colorado-based, independent energy 6 consulting firm. So, I'm a numbers guy. I've been 7 invited here today because I've spent a lot of time 8 working on kind of benefits quantification in 9 California. 10 So, I'm going to present that a little bit, but 11 also talk a little bit more about kind of the general

12 context that's covered a lot of what we've been talking 13 about today.

14 If I can have the next slide, please? So, this 15 is really just -- you know, in California, and I guess I 16 maybe have the benefit of not being a Californian, it 17 strikes me that there's a lot of maybe conflicting 18 policies.

And, you know, you have an RPS that's 33 percent, you have a least-cost-best-fit. Are those -can you do both of those? I don't know.

22 But this is based on work that I'm doing with UC 23 Irvine, thanks to some CEC funding, it's called the Grid 24 Project.

25 And the purpose of that is to look at the

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1 technical and economic impacts of increasing renewable 2 penetration. So, we have a 33-percent mandate. You 3 know, Jerry Brown has said, well, if you can get 33, why 4 not 40 percent.

5 So, really looking at is that possible and, if 6 it were possible, what would the technical and economic 7 impacts be?

8 And the three graphs here are just kind of 9 showing how, as the penetration of the renewables 10 increases, the operation of the grid gets more chaotic. 11 And I think that's probably pretty widely accepted at 12 this point.

13 The red, to the right, where we're approaching 14 50 percent, is indicating curtailment from wind. So, 15 that's basically resources that are being wasted.

16 You see we have the role of the complementary 17 technologies as we get towards more and more renewable 18 penetration.

We've heard about the complementary technologies or, for instance, energy storage, demand response, and electric vehicles could also play an important role in helping to reduce some of that or manage some of that chaos.

The next slide, please. So, we've also heard a lot this morning about, you know, the need for

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1 additional grid flexibility. And I guess my perspective 2 is with all of the policies that you have, the 3 legislative mandates, how do you meet those, to the extent you can meet them all, at the lowest cost and to 4 5 take advantage of the greatest amount of benefits? 6 We know we've got intermittent wind and solar, they tend to be the ones that are coming on, first. 7 We 8 need not only the existing technologies, but the future technologies to help balance the intermittency of those 9 10 technologies. 11 You know, we've got base load generation, we've 12 got fuel cells that could take advantage of the 13 bioenergy, the biogas that we've also heard a lot 14 discussed about this morning. 15 We heard from the woman from the Cal-ISO about 16 the geothermal, I think one percent of her 65,000 was in 17 the queue, geothermal. 18 Dispatchable, if you don't have a complementary 19 or kind of non-generating technologies, like demand 20 response energy storage of many types, of which EV could 21 really be considered a part, you are going to see more 22 peakers. 23 I mean we have to have -- if you're not -- if 24 you don't have those complementary technologies to move 25 the energy around, you do see a lot more peakers, and **CALIFORNIA REPORTING, LLC**

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1 then that kind of reduces the benefits, on a stand-alone 2 basis, of increased renewable penetration. 3 Solar thermal with storage we've heard, you 4 know, that has some capability for some dispatch. 5 Storage is still relatively costly. 6 The next slide, please. So, these are just two 7 examples and they're pretty small, of kind of the 8 quantification of benefits that Empowered Energy has 9 been involved with over the last about seven years, 10 actually. 11 The top one is actually with respect to fuel 12 cells and this has kind of become to be known as the 13 waterfall chart, the waterfall analysis because of the way it kind of falls down the side there. 14 15 And somebody asked me, oh, are those two decimal places significant? You know, we've heard you can't 16 quantify to the exactitude. 17 18 The whole purpose of these was to demonstrate, 19 based on all the underlying assumptions, the benefits in 20 all of these different categories. And it was 21 important, deemed to be important to kind of put them in 22 the different slices because there's a lot of 23 disagreement about where the benefits really lie. Ιf they are benefits, if they are not benefits, can we 24 25 quantify them, how do we include them? **CALIFORNIA REPORTING, LLC**

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1 So, the purpose of putting them in all of the 2 different categories was so that if you're in a 3 discussion and somebody says, well, you know, the value of health benefits, this is always a very contentious 4 5 If you don't believe that value of health benefits one. 6 exist or can be quantified, then you can take that out 7 and see how it affects the kind of cumulative value of 8 any given technology.

9 The fuel cell case here was for 75 percent 10 biogas, digester gas, with 100 percent cogeneration. 11 And the lower right is basically the same type 12 of analysis, but presented a little bit differently. 13 This was done for solar rooftop PV in anticipation of 14 the SB 32, or what we thought that might look like. So, 15 essentially, it takes the market price referent as a 16 starting point and calculates, well, what are the 17 benefits that PV, rooftop PV would provide that aren't 18 already captured in the MPR.

19 Again, both of these are very California
20 specific, trying to rely on as much California analysis
21 as possible so that we don't have to reinvent the wheel.
22 Two real points to make, and so these are real
23 technology specific valuations, where the value is going
24 to depend on what kind of product they provide, peak or
25 base load and, also, it's going to depend somewhat on
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1 the timing.

2 Chair Weisenmiller talked about the value of 3 hedging with renewable energy. One point that's 4 important to make about hedging, the purpose of hedging 5 is to reduce the outliers, to reduce the high spikes in 6 energy costs, so the unknowns about CO2 pricing. It 7 doesn't necessarily give you a minimum cost.

8 So, and I think Steven referred to it as the9 insurance value.

10 So, next slide, please, the last slide that I 11 have. So, we started out with the technology specific 12 kind of benefits analysis because that's where the 13 investment starts. And as we increase the renewable 14 penetration, the need for kind of a simultaneous and systematic analysis to kind of handle and understand how 15 16 that kind of increasing complications in the grid to be 17 handled becomes more important.

Every technology has its own benefits and every technology imposes its own costs on the system, and I think it's important that kind of both sides of that are recognized.

And if we look at it all together, to the best that we can, we're never going to be able to completely model it. But looking at the grid-wise valuation, then, captures the interaction of those costs and benefits of CALIFORNIA REPORTING, LLC

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1 each technology.

2	So I think you know, I think there is a role
3	in you know, if the feed-in tariffs move forward
4	successfully, for technology specific feed-in tariffs,
5	otherwise I think you you implicitly choose a
6	technology by saying one size fits all.
7	So, I am in favor of feed-in tariffs that do
8	capture the benefits and that are technology specific,
9	just in part to get the mix of technologies that have
10	different purposes.
11	I think this morning Steve Weismann said, well,
12	if we don't do anything, you know, what are we going to
13	do with the quantifications, what usefulness does it
14	serve if we don't have anything to do with it.
15	I think the concept of what I call, I guess, the
16	greenhouse gas penalty as part of procurement is getting
17	you to if that's really how you choose procurement,
18	then that's going to select a different generation than
19	if you don't have that.
20	You could do the same thing with benefits, if
21	you have health benefits or costs associated with
22	different technologies, you could put that in that kind
23	of procurement analysis.
24	That, to me, is a less transparent means of
25	getting to probably the same end, than if you put it
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1 more transparently into a feed-in tariff and say, okay,
2 this technology-specific technology has these benefits,
3 we're going to include those benefits as -- perhaps as
4 an adder in a feed-in tariff, and be very transparent as
5 to why those feed-in tariffs are set at what levels they
6 are for specific technologies. Thank you.

MS. WISLAND: Okay, last speaker. I'm sorry,
8 I'm going to be not facing you, so I'll talk to my
9 fellow panelists.

10 COMMISSIONER PETERMAN: That is fine. Thank 11 you.

MS. WISLAND: Okay. Good afternoon, I'm Laura Wisland, I'm a Senior Energy Analyst with the Union of Concerned Scientists. I appreciate the opportunity to provide some comment today.

16 Most of my comments are going to react to things 17 that I've heard during the morning and afternoon 18 sessions.

19 I just wanted to start off, Kate mentioned that 20 the RPS was passed and it has a whole suite of benefits 21 that we're trying to achieve.

And so I thought Warren, this morning, did a really good job of capturing those benefits into four categories. So, we've got the energy system benefits, the potential cost reductions to transmission and

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distribution, that's geographic specific. We've got the
 economic benefits, including job creating and also
 including the hedging value of being less exposed to
 unpredictable fossil fuel prices.

5 We have the environmental and public health 6 benefits, which I'm mostly focused on, and that's 7 reduction of greenhouse gases. That's not having to 8 extract fossil fuels and not having to transport them.

9 People don't really think that a lot of times, 10 and for gas it might not be a big deal, but for other 11 fuel sources it is.

And reducing criteria air pollutants. And then the public policy benefits of being a leader in the country and actually, in California, it's really for the world, for that matter.

16 And ancillary to that, the public policy 17 benefits of us investing in the new generation of these 18 technologies, clean energy innovation, which is not the 19 topic of this panel, but it is related.

20 So, there's lots of good stuff going on here 21 that renewables can provide and that's a great success. 22 But, you know, honestly, I don't know if we're going to 23 be able to capture all of those benefits and optimize 24 them in the RPS policy.

And so I'm going to talk about the RPS because CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 that's what I work on most. What I've really been 2 thinking about lately is, you know, which benefits 3 should the RPS specifically focus on?

And then once we create that umbrella and then once we create that market for renewables and send that long-term demand signal, then should we create additional policies under that umbrella to deal with some of the equity issues, to deal with some of the specific benefits we may be able to achieve in geographic-specific areas.

11 So, from my perspective and from UCS's 12 perspective, the most important benefit of the RPS is 13 getting new, clean energy generation on the Western 14 Grid, and providing those greenhouse gas benefits, and 15 providing an alternative to fossil fuel generation, 16 that's the most important benefit.

And so how do we do that? There's two things 17 18 that I think are really important. The first thing is 19 focusing on transactions that actually get new energy 20 generation built, and making sure that instead of --21 making sure that the procurement is not purchasing 22 existing projects that were built through PERPA, or for some other state's program, but actually, really 23 24 encouraging transactions that get new projects financed 25 and built, and sending a long-term price signal. I mean

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1 not a price signal, sending a long-term policy signal 2 about where we're going in the future. That's really 3 important and that's something that we haven't really 4 discussed much today.

5 So, on the long-term contracting, this is 6 actually a really important issue that's being discussed 7 at the PUC and the Energy Commission right now, they're 8 both in the process of developing the rules for the RPS 9 compliance.

10 And the new RPS law really went a long way, I 11 think, in terms of better prioritizing long-term 12 transactions, but there's still some uncertainty about 13 how this is all going to play out, and whether all the 14 utilities are going to be playing by the same rules, and 15 whether they're all going to be equally as incentivized to make good decisions and good -- good project 16 17 management decisions, and good procurement decisions so 18 that eight years down the road we're actually going to 19 get and achieve the 33-percent RPS. I still think 20 that's something that's really important.

In terms of long-term policy certainty, I think we're going to have to make a decision about where we're headed in the next couple years.

24 So, just in preparation for this panel I did 25 some quick, back-of-the-envelope calculations to get a

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1 sense of how close we are to the 33 percent RPS.

And I just looked at the procurement, the procurement data for the three large IOUs, plus DWP, plus SMUD. I took a look at what's -- you know, what's existing now, what's online now, plus what's been approved by the PUC, plus what's been contracted for, but not approved by the PUC.

8 And with assuming a 33 percent project failure 9 rate, we're about three-quarters of the way there, 10 already, on paper at least.

11 So, that tells me that if we want to keep this 12 market going, and we've created one of the largest 13 renewable energy markets in the country, and we want to 14 achieve all these different benefits that we've been 15 talking about through all the policies that are 16 complementary to the RPS, then we need to start thinking 17 about what happens after 2020.

18 And I think one of the questions for the Energy 19 Commission is what do we do if we can't adequately 20 quantify all of these benefits of renewables? Are we 21 prepared to have these discussions and move forward, 22 even if we're not able to completely accurately quantify 23 all these benefits? 24 And then I just wanted to respond to one of 25 Aaron's slides that he showed this morning, and we've

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2 connection between renewables and transportation. 3 So, Shana mentioned this morning -- so Aaron's slide shows that in-state electricity generation is 4 5 actually a very small, relative portion of criteria air 6 pollutants and greenhouse gas emissions, which is true. 7 But we also know that the emissions that do 8 occur are highly concentrated and usually in areas of 9 low-income communities. 10 We also know that those communities live near 11 transportation corridors, they're disproportionately 12 exposed to the emissions associated with goods 13 transport. 14 If we can figure out how to electrify most of the vehicle feet, and there's two separate analyses out 15 16 there, one from E3, one from California Center for 17 Science and Technology, that both say, really, the only 18 way we're going to get to our 2050 emission reduction 19 goals is by electrifying a significant portion of the 20 vehicle fleet. 21 We've got to do that and we have to do that 22 making sure it's a clean energy grid. If we don't, then 23 we're just going to shift that pollution somewhere else. 24 So, you know, the benefits of renewables, in 25 procuring renewables is going to affect more than just **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

talked a little bit about this, and this is the

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1 that sliver, it's actually going to affect the pollution 2 associated with transportation emissions, hopefully, 3 which is a much, much larger percentage, and has much far-ranging public health benefits. 4 5 Yeah, and I'll leave it at that for now. 6 COMMISSIONER PETERMAN: Great. Well, thank you. 7 And just the point about electrification, for those who 8 don't follow the Energy Commission's transportation 9 work, we manage AB 118, \$100 million a year fund of 10 alternative fuels, and vehicles, and infrastructure, and 11 do that, the complementary program with the ARB. But, for example, by the end of 2012 we'll have 12 13 funded -- \$52 million in funding for electric charger 14 vehicles, as well as a few million dollars for PV readiness -- I'm sorry, EV readiness plans. 15 16 And so, indeed, electrification is something 17 that we're thinking a lot about here. 18 I suggest we take --19 MS. ZOCCHETTI: Madam Chair, may I interrupt for 20 a moment? 21 COMMISSIONER PETERMAN: Yes. 22 MS. ZOCCHETTI: We do actually have one more 23 panelist on the phone. Oh, apologies. 24 COMMISSIONER PETERMAN: 25 MS. ZOCCHETTI: Oh, no, no problem. So, we have **CALIFORNIA REPORTING, LLC**

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Randy Howard, from LADWP, on the phone as our final
 panelist.

3 COMMISSIONER PETERMAN: Oh, great. Thank you.
4 MS. ZOCCHETTI: Randy, would you like to give
5 your opening remarks?

6 MR. HOWARD: Yes, thank you, Kate. I wish I 7 could be there, I'm covering for Cindy Montanez, who was 8 unable to, and so you don't see a PowerPoint from me. 9 And it sounds like even if I had provided it, it would 10 be cut up into small pieces.

11 COMMISSIONER PETERMAN: Not yours, Randy. Not 12 yours, don't worry.

13 MR. HOWARD: Not mine. Thank you, Commissioner. 14 And so, maybe it's just as well I'm not in the room it sounds like it would be pretty exciting and I'd 15 16 be on the edge of my seat because going last I certainly 17 would have a lot of responses to a number of comments 18 that were previously made, and I won't go into that now. 19 I'm going to touch on, really, just two things. 20 One is just kind of an overview that a lot of people 21 don't think maybe we're going quite fast enough from the 22 utility sector but, in reality, we're transforming at 23 kind of record speed when you consider that, you know, a 24 typical renewable project has taken us three to seven 25 years to develop and bring online. A transmission line **CALIFORNIA REPORTING, LLC**

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1 might be seven to ten. And if we're doing some large-2 scale storage, like a pump storage, you know, you're 3 talking eight to 12 years for those type of projects to 4 go from concept to final operation.

5 So, we're moving quite quickly and most of us 6 have never operated our systems to these levels, 7 already, of the intermittency, and just trying to 8 address the intermittency effects.

9 When you have some of these systems, like at 10 LADWP, where the difference between our peak in the fall 11 and the spring is about half as much as our peak in the 12 summer, and our off-peak hours of the night are maybe 60 13 percent of our day peaks right now in the spring, and 14 the fall.

And so when you add substantial wind, and it's primarily blowing in the evening hours, it's quite difficult to operate your system.

And so storage is a critical element of that in the integration. But we are all learning in this process and we're trying to fine tune and optimize as we continue to add additional resources.

22 So I just wanted to highlight that, that it is a 23 very significant transformation. One of the biggest 24 failures that we see in the experience of these multiple 25 mandates that have been brought down, and there still 26 CALIFORNIA REPORTING, LLC

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1 remains quite a lot of regulatory uncertainty.

But as each regulation becomes a little more certain to us, we're still finding that these regulations, on a statewide basis, aren't integrated. And so we continue to find the different agencies, as well as the various focus interest groups

7 aren't taking the time to really integrate.

8 We try to do more of that at the utility level,9 but it's quite a challenge.

10 And so I look forward as the -- what's very 11 apparent in this year's IEPR is trying to do more of 12 that and also consider the costs going forward. So, I 13 do appreciate the efforts of the CEC and the staff 14 there.

What I wanted to just touch on because, and the IOUs have been going through this for a while at the CPUC, but the Major of L.A. signed the feed-in tariff program today, the ordinances that delegated the authority to LADWP to move forward with its feed-in tariff. And so we are proposing to do that quite quickly.

Some of the objectives of that program are to create a solar power funding mechanism that would augment what was previously the Solar Incentive Program. So, as those funds kind of dry up on the Solar Incentive CALIFORNIA REPORTING, LLC

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side, and we continue to see significant demand there, side, and we continue that growth of solar within the distribution service territory?

We're also seeking, really, to have a program
that will provide a reliable, very cost-effective,
dependable program.

We are looking in there to encourage the electrical generation from renewables much closer to the load center. So there's been a lot of discussion, it sounds like, on do we carve out particular technologies? In our initial, 10-megawatt demonstration, which we think will be a short phase, it's really to focus on pricing, and I'll get a little bit into that.

We don't think we need to carve out technology at this point. We are carving out geography and we're carving out types of customers, because our concerns are how do we approach low income, how do we ensure that parts of our system that are multi-family are able to participate in a feed-in tariff type program going forward.

21 So, we are launching, immediately, with a 10-22 megawatt demonstration. It will determine customer 23 interest at different size ranges, so we're going to do 24 some small, 30 to 150 kw, some larger at 150 to a 1 25 megawatt. And we're doing it at locations, including a CALIFORNIA REPORTING, LLC

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carve-out for our Owens Valley, which is a more rural
 type system.

We hope to gain some price discovery for these different sizes and locations. We want to spent a lot of time working through the customer interaction, the application.

7 We've had, to date, almost eight customer-8 related workshops. We're going to have several other 9 workshops, now, on the actual application and how 10 participants can apply to participate.

11 We are in this process, for the demonstration, 12 working with the City of Los Angeles building safety 13 with the city's planning and the fire. We want to 14 ensure that it provides the social benefits. We don't 15 want, you know, solar systems installed that would cause 16 great grief to the fire department as to, you know, 17 being able to have access to critical parts of 18 facilities. If there was an emergency or a fire, we 19 want to ensure that it meets the city planning goals. 20 So, we're working jointly with the other city 21 departments to ensure that happens. 22 Upon completion of our 10-megawatt 23 demonstration, we are building a platform to launch into 24 a 75-megawatt and then up to 150-megawatt program. 25 So, the timing for us is we're not going to wait **CALIFORNIA REPORTING, LLC**

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for the installation of all the demonstration projects to start planning the full expansion. We think we're going to learn a lot just in the initial phases of the demonstration project, and then be able to launch guickly into the full process.

6 The pricing for us, we are using a bid type 7 process. We think that's the appropriate way in at 8 least the demonstration.

9 Now, once we complete the demonstration, receive 10 the price signals for the various sizes and locations, 11 we will determine at that point if we want to continue 12 using a method of price discovery. Kind of some folks 13 call it an auction, we call it requests for proposals. 14 That might be one mechanism.

15 Or we will choose pricing based on what we saw 16 in the demonstration and offer those prices out, and 17 then try to fill the quantities that we have going 18 forward.

We do expect our solicitations for our 75megawatt to be open in 2013. All demonstration results and the big projects will be awarded by the end of calendar year 2012.

23 So, we do expect quite a lot of benefit within 24 the city. The City of L.A. is different than other 25 cities. I mean one thing we've tried to get across at CALIFORNIA REPORTING, LLC

the Energy Commission is there needs to be
 consideration, all utilities are a little different,
 they come to the table with different resources,
 different geographies, different types of customer
 bases.

6 We have, in the City of L.A., 1.4 million 7 meters, about 4 million customers, but we have out of 8 those almost 600,000 of the customer meters are multi-9 family. So, a lot of them don't own their roof. And 10 then many of t hose that are in more condominium type 11 complexes, they don't control the roof, themselves. So, 12 it becomes a little more challenging for programs like 13 this, but we're going to try to work through that by 14 carving out specific opportunities and ensure that we 15 understand how it would best fit our customers going 16 forward.

With that, I'll stop and then we can get on toother questions and discussion.

19 COMMISSIONER PETERMAN: Thank you, Randy. I'll 20 recommend, since we've been at it for about two hours, 21 since lunch, that we take a five-minute break, stretch 22 our legs.

A couple of announcements before that, one, I'll ask staff during that break time to put up the list of future workshops and dates, just so people have a sense CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 of what else we're going to cover.

Also, in the spirit of renewables integration, I will ask our panelists during the break to switch up their seats, sit next to someone who you may less as well, or perhaps you know too well, and share a difference of opinion, but then you can team up for the best ideas.

8 And then a third announcement is that while 9 we've been sitting up here solving the world's problems, 10 the Energy Commission family has extended and expanded 11 and, hopefully, it will be a -- I received a press 12 release, while sitting up here, that Andrew McAllister, 13 a panelist, has just been appointed to the California 14 Energy Commission.

15 And so, first of all, congratulations, Andrew.16 (Applause)

17 COMMISSIONER PETERMAN: He's held numerous
18 positions with the California Center for Sustainable
19 Energy and done all types of great work, which you can
20 find on the website.

But for those listening, it means that participating on a panel, here, might just lead you to becoming a Commissioner. So, if that's not enticing enough, I'm sure our Chairman might want to say a few words as well.

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1 CHAIRPERSON WEISENMILLER: Certainly, we're very 2 glad to have the appointment today, certainly looking 3 forward to working with Andrew more in the future on the 4 stuff. And, again, a very good appointment and I think 5 we're very happy, and so welcome aboard.

6 COMMISSIONER PETERMAN: So enjoy sitting on that 7 side of the table.

8 MR. MC ALLISTER: Yeah, for a little bit. Thank 9 you very much. I just, not to take up a whole lot of 10 time here, but it's been a little bit bizarre knowing 11 this was happening, and waiting for the press release to 12 come out and sort of like not knowing what people --13 anyway.

But I'm really happy. I think there's a lot of heavy lifting to do. There's a lot of really great work, you all are doing a fabulous job, along with Commissioner Douglas.

18 I'm very humbled by the appointment, for sure, 19 and definitely feel like it's just, you know, a great 20 opportunity for me, personally, obviously, but just 21 there's so much to do in the State I'm really excited to 22 sort of approach it with that public service attitude. 23 And then, also, I need to know where I can buy 24 my Commissioner hat, because I imagine you must know 25 that, so I need to go out and get one really quick. So,

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1 thank you very much.

2 COMMISSIONER PETERMAN: You know, Andrew, I 3 found one of my office. We're no longer are able to afford swag, or buy it, so there is no Commissioner hat, 4 5 but we'll work on it. 6 MR. MC ALLISTER: Fair enough. 7 COMMISSIONER PETERMAN: Yeah, you can buy your 8 own t-shirt for \$29 every July. 9 So, we'll reconvene at 3:40. Thanks. 10 (Off the record at 3:34 p.m.) 11 (Reconvene at 3:50 p.m.) 12 COMMISSIONER PETERMAN: I think we're going to 13 aim to have this be -- have this workshop even end 14 early, so maybe at 4:59 is what I'm shooting for to give 15 us a good track record. 16 You can't hear? Oh, no, we've had a call to 17 have us go until 5:00. I guess someone's getting 18 overtime, 5:01. Sorry about that, court reporter, we'll 19 make you get your overtime. 20 All right, and we've already gotten one card for 21 public comment, so that will be exciting. 22 So, now that we've heard from all the panelists, 23 I'll turn this back over to the Moderator, Kate, for 24 whatever questions she would like to put to the group, 25 and also that she provide opportunity for panelists to **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

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ask each other questions.

2 Of course, I'm sure you will all be respectful 3 and mindful of the time, as well. Thanks.

4 MS. ZOCCHETTI: Thank you, Commissioner5 Peterman.

Do you want to put the questions back up orwould you like to keep the dates up?

8 COMMISSIONER PETERMAN: You can put the 9 questions back up, I just wanted everyone to see the 10 Energy Tour, Summer 2012 that we're about to engage in, 11 and start getting excited. You can find copies of this 12 online.

MS. ZOCCHETTI: Thank you. So, our first question has to do with policies and programs and we've talked a little bit about some Federal, mostly State, and some local programs. So, I think this question can expand on those comments.

18 The question is how do current policies or 19 programs capture benefit values of renewable energy? 20 And there was quite a few of the panelists have 21 mentioned that a lot of the programs, or policies, or 22 both are fragmented, or inconsistent, or not working 23 together. So, personally, I'd like to hear how perhaps 24 better integrating those programs could do a better job 25 of capturing the benefits from renewables.

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And so, this is kind of a free for all, anyone. I don't want to put anyone on the spot by calling on you, but I would encourage folks to answer the questions that are near and dear to their heart, and we can start with anyone.

6 Yes. And please state your name for the folks7 listening in.

8 MR. ULRICH: This is Marc Ulrich, at Southern 9 California Edison. I want to say that there is a lot of 10 fragmented kind of policies. And as Aaron showed on his 11 slide, we have procurement programs that are all policy 12 driven, that an individual, one-and-a-half megawatt, 13 solar rooftop, photovoltaic can participate in five 14 different procurement programs.

15 They can do the SPVP, they can do the RAM, they 16 can do CREST, they can do the PURPA QF project, and they 17 can bid on the large solicitations, too.

But there isn't -- this isn't bad news. I mean
what ends up happening is the seller will,

20 appropriately, seek the highest price of all those

21 programs. There could be three programs that they're

22 economical for, but whichever one's paying me the most,

23 that's the one I'm going to do.

24 Well, that means the difference between what 25 they needed and what we're actually paying them could CALIFORNIA REPORTING, LLC

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1 have been used to buy more renewables, and that's unfortunate, but it's getting fixed. 2 3 So, the CPUC is working very hard to -- they recognize these overlaps, they recognize the 4 5 inconsistencies and they're working on it. 6 I'll give you an example. The RAM, w which is the auction mechanism for up to 20 megawatts, used to go 7 8 from a megawatt all the way up to 20, and CREST used to 9 go from zero to one and a half. It's now going to go up 10 to three megawatts, and it's going to stop there, but 11 RAM's also going to start there. 12 So it will be zero to three is going to be for 13 feed-in tariff, I think they're calling it RMAT, 14 Renewable Market Adjustment Tariff. 15 And then from 3 megawatts to 20 megawatts will 16 be RAM. 17 So, there are efforts to try to coordinate 18 these. Now, I recognize that I'm talking about very 19 small procurement policies and programs, but it's not 20 all bad news. People recognize that we're moving really 21 fast, we're putting a lot of programs in place and these 22 are stepping on each other or they're not capturing all 23 the benefits in all places. 24 MS. CAPRETZ: Well, my response to that is --25 MS. ZOCCHETTI: Could you state your name, I'm **CALIFORNIA REPORTING, LLC**

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1 sorry?

MS. CAPRETZ: Oh, sorry. I'm Nicole Capretz,
from Environmental Health Coalition.

Is that I agree for the larger systems within the small scale, zero to 20, like the three -- or maybe even 1 to 20, there are existing program models that folks can fit into.

8 But the zero to one, which is building scale 9 solar, which is what zero net energy policy is really 10 trying to address, there aren't really existing 11 programs, outside of net metering, or CSI which, as we 12 all know, is expiring soon.

13 So, what do you see is the program model for 14 that?

MR. ULRICH: Yeah, so there is a home today and it's called CREST, California Renewable Energy Small Tariff, and it was only eligible up to one and a half megawatts. Most of our projects there, we have 56 something projects for 75 megawatts, most of them are less than a megawatt.

21 So they've been surviving. I think PG&E has 74 22 megawatts of this CREST type program, so they're all 23 small, around a megawatt or less.

24 But what we're learning is in the next version 25 of this it will go all the way to three megawatts, but

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1 it will go as low as zero or -- or sorry -- zero. 2 There's got to be something, right, we're not paying for 3 nothing. 4 MR. JOHNSON: You're losing money, Marc. 5 MR. ULRICH: Yes. You know, the utilities are 6 very good at buying high and selling low, we do it almost all the time with generation, especially in the 7 8 OF area. 9 MR. KELLY: You probably (inaudible) 10 MR. ULRICH: Thank you, Steven. 11 So, the new programs will be there, the new 12 program that the Commission just put out a proposed 13 decision will replace the CREST tariff and it's focused 14 on the small stuff. 15 But one of the points I was going to make is as 16 we evolve, we learn about things. 17 For example, in the CREST program we saw a lot 18 of people, it was only eligible for up to one and a half 19 megawatts. We saw somebody take a 20-megawatt project 20 and break it up into 20 one-megawatt projects. That's 21 not the intent. We rejected them, but we need the 22 flexibility to reject them. 23 So, when we get a lot of rules that are 24 micromanaged, we worked really hard to reject that 25 particular seller in the CREST program, and we had to **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

stretch to find something to allow us, because it was a
 well-defined tariff that gave us almost no flexibility.

3 So, in our procurement programs, in our 4 processes of capturing these benefits we learn. And 5 there's some really good staff at the Commission who 6 learned you launch a program, you see how the program 7 works, you hold a forum with all the stakeholders, you 8 revamp the program, you re-launch the program. You see 9 what people are doing, is it getting what we want? Do 10 we see gaming? Have another stakeholder forum, re-11 launch.

And so we're doing that with SPVP, which is our commercial rooftop. We're doing it with RAM, we're doing it now -- we will do it with the RMAT.

15 So, all of this is evolving over time and I 16 think that's a good thing because we get the objectives 17 of capturing these benefits, but we get them at the most 18 cost effective manner so that we can get more of it.

MR. LEWIS: I'd like to jump in here. CraigLewis, with the Clean Coalition.

21 The Clean Coalition really tries to stay with 22 facts and figures that can be quantified, and there's 23 lots of data out there that we'd love to incorporate, 24 but we know that it's just almost impossible to get it 25 through the policymakers because there's going to be an 26 CALIFORNIA REPORTING, LLC

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1 opposite side to that argument.

But the Clean Coalition is very focused on wholesale programs. We think that wholesale is the future, wholesale distributed generation is the future. We've got to get out of the death spiral scenario where the utilities are losing all their load, which happens on retail programs like CSI, once they get into significant percentages of the load.

9 So, to answer the question one, how do the 10 current policies and programs capture the benefit value 11 on the wholesale side?

12 There's really two specific areas where they are 13 captured and the first one is time and delivery. Time 14 and delivery is a really clear place where value is 15 captured and it is either stacked on top or taken off 16 the bottom.

17 In the case of wind, which blows mostly at night 18 in California, you're actually getting a decrease in the 19 PPA rate that somebody's -- that one's going to get 20 because of the TOD adjustment.

The other area where there is value that's being captured is in there is some greenhouse gas capture that is in the market price referent, and I don't know how that's going to continue playing out or not because the market price referent is going away, for the most part,

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1 as a basis here in California.

11

2 But the big opportunity for capturing value that 3 is not -- that's completely ignored right now is locational benefit. And locational benefits, as I said 4 5 before, I mentioned that the SB 32 staff proposal, from 6 the California Public Utilities Commission, has a locational benefits adder that was devised by E3, and it 7 8 went up to -- it was expected to be as high as eight 9 cents a kilowatt hour, so really significant. 10 And that eight cents a kilowatt hour would have

12 it's where you're in downtown Los Angeles, downtown San 13 Francisco.

applied where you're sitting right on top of a load,

And, unfortunately, we didn't get that and right now locational benefits are not factored into any of the programs that we're talking about, that we have in California, and that has distorted the market.

And I think what Marc just mentioned, with Southern California Edison taking its available capacity under the solar PV program, that was a great program, we loved that program because it was rooftop focused, and it moved that capacity and put it to ground-based focused.

24 Well, we just distorted the marketplace because 25 we didn't give the locational benefits value of those CALIFORNIA REPORTING, LLC

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rooftop projects that are sitting right on top of the
 loads, and we gave all that extra capacity to the
 ground-based, you know, RAM -- RAM program.

So, I think that the fact that we don't have locational benefits is a real disservice to California ratepayers. We're missing real, quantifiable value that's there and we're ignoring it. And because of that we're distorting the way that these programs are working.

10 MR. MC ALLISTER: I guess the Smart Grid --11 several of these things have been brought up before, but 12 the Smart Grid, and all the data that's going to be 13 flowing around because of that, it already is flowing 14 around but we're still -- everybody's struggling about, 15 you know, what benefit is this information really going 16 to provide?

And there's -- maybe this is more on the cost side, than the benefit. It's more of a reduction of cost argument than a generation of benefit argument, but you could sort of say they're similar.

21 But the utilities, I think, are concerned about 22 the high penetration scenarios and indicate that with 23 lots of small scale rooftop DG you're going to, you 24 know, get voltage variations, and all these near-term 25 fluctuations, and then we're going to have problems with CALIFORNIA REPORTING, LLC

our transformers and, you know the tap changes are going
 to burn out sooner, and all these kind of downsides that
 generate costs.

But there is actually a difference, in a given distribution feeder, where a system goes, if it's nearer to the truck lines, if it's farther from the truck lines, you know, the impacts are different and they flow into the distribution grid in a different way.

9 And so I think there's a pretty strong argument 10 that the conditions are coming up here pretty quickly 11 where you could have a lot more locations down, instead 12 of just at the substation, or a relatively high level in 13 the subtransmission grid, or whatever, down in the 14 distribution grid and actually have -- generate those locational benefits, actual numbers. You know, even if 15 16 we keep it typical and not talk about sort of the more 17 social benefits and everything, but you could actually 18 generate those numbers.

19 And some of the policies that you were talking 20 about earlier where you say, okay, well, we're going to 21 allow the benefits on a locational level, well you could 22 get pretty granular with that analysis and actually 23 have -- send the price signals down to, you know, the 24 neighborhood, or the little part of the distribution 25 grid depending on how much congestion you're going to 26 CALIFORNIA REPORTING, LLC

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1 generate and what the actual system on the grid is.

2 So, I think those sorts of -- you know, we have 3 the technology, we can build it, right. So, I think as we have this data and we learn how to manipulate it and 4 5 automate a lot of these stuff, the possibilities are 6 pretty huge to incorporate. To not just accept, you 7 know, the 15 percent, you know, penetration number but 8 actually find out where it could be a lot higher than 9 that and go towards that scenario without a lot of worry 10 about the downside from the reliability perspective. 11 MR. KELLY: Well, I'll just follow up on that,

12 though, because I made the point earlier, tried to make 13 the point earlier that investment is driven by the 14 procurement decisions.

So, even if you've got all that information at a quantitative level, at the technical level of the CEC, how do you translate that information into an effective procurement decision?

And if it is done under the current protocols, developers don't know what those values are. Developers do not know that, for example, impacts on low-income environmental injustice communities are 60 percent of the value of your bid, as opposed to price, or the opposite of that.

25

We know generally what is used in the

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consideration of the valuation, but if it's going to
 really matter from a State policy perspective where you
 put your stuff, then people have to know in advance, way
 in advance what -- how much it's going to value in the
 bid evaluation. And that information is, in my opinion,
 not publicly available.

7 MR. MC ALLISTER: And if -- it's already not 8 publicly available. So, one question is whether you're 9 talking about a wholesale scenario, or a net-metered 10 type scenario where the customer is making the decision 11 and they need the information versus, you know, a 12 developer and they need the information.

But in net metering it's all pretty blurry as it is because it's all mediated by the bill. So, we've struggled -- actually, already on the net-metered scenario we're struggling with similar issues.

17 So, you know, transparent pricing I think would 18 unlock a lot of benefit, if we could figure out how to 19 communicate, like you're saying. I don't have the 20 answer to that.

21 MS. ZOCCHETTI: Could we have -- let's have 22 Laura go next and then Lori.

MS. WISLAND: Well, I just wanted to respond to the fragmentation question, so if you want to follow on this thread.

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1 MR. LEWIS: I just wanted to -- when you say the 2 clear pricing are you talking about a procurement price 3 on the wholesale side or are you talking about a clarity 4 on the retail price?

5 MR. MC ALLISTER: Yeah, just sort of being able 6 to communicate to the customer, say, on a net-metered 7 scenario what the particular neighborhoods,

8 characteristics are for -- you know, giving them some 9 information so they can at least anticipate what the 10 benefits are going to be when they install. You know, 11 it's a difficult proposition to do, but it is a 12 function -- it is doable if you understand the 13 distribution grid.

14 COMMISSIONER PETERMAN: Well, and I think 15 someone from one of the utilities can speak to the fact 16 about the distribution maps that have been put up to at 17 least talk about -- I'm setting you up here, Marc, go 18 for it.

19 I'll just speak -- I'll finish the points
20 because those on WebEx can't see, he just held up
21 something on is i-Pad for me to look at. But there's
22 distribution maps talking about preferred locations for
23 DG in terms of distribution upgrades. And maybe, Marc,
24 can you speak to that?

25 MR. ULRICH: Yeah. So these are all good

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1 points. One of the things that I've heard is more 2 transparency, more transparency, but I've also heard 3 that we should provide adders.

So, I believe in more transparency, so one of the things we've done, I think PG&E's done the same, is we have down to the distribution level, you go get Google Earth, we can tell you where there's excess capacity in the distribution grid.

9 What we don't want to do, Craig had mentioned 10 earlier is, you know, the transmission access charge is 11 about two cents these days. Well, he's saying that we 12 should pay eight cents to have somebody locate in the 13 areas that I'm telling people to locate with these, with 14 the Google Map. So, the math doesn't work out for me.

15 What we'd need to do, as utilities, is continue 16 to provide this kind of information to tell people where 17 the value is.

But if I have to pay, as a customer, that value to the generator, if the generator doesn't need it, then there's no real benefit for them locating here,

21 financially anymore, either. So, we do this.

22 And in the most recent Commission's decision on 23 the feed-in tariff what they've said is if you don't 24 show up in these areas, they haven't lost the locational 25 benefits as Craig says, they say if you don't show up in CALIFORNIA REPORTING, LLC

1 these areas, you're not eligible for the feed-in tariff.

2 That's saying that not only is the location 3 important, it is a criteria. If you're not local, you're not eligible. So, that's a much better approach, 4 5 in our opinion, than just saying we'll allow people to 6 be in the desert to participate in the feed-in tariff, 7 and people local in these areas to also participate. 8 And the people who do local, we'll give you an eight 9 cents more price. That doesn't play well.

10 Our experience, when you do these adders and you 11 start paying the generators, the adders, they start 12 gaming the systems.

And so as I've said in the slide, the only thing the generator needs to know is information like where do you want me, when do you want me, what kind of technology, and we provide all that information. And they need to know their costs.

18 Because once you start telling them, hey, if 19 anybody shows up in the green, I'm going to give you 20 another 80 cents. If you show up in the red, I'm going 21 to give you another 40 cents. If you show up in the 22 blue, I'm going to give you another 20 cents. I promise 23 you games will be played, that's what our experience has 24 been in 2008 and '09, when we launched our first fixed-25 price, MPR-based feed-in tariff.

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1 And we revised that to an auction in 2010 and 2 the Commission's adopting that under RAM and it works. 3 Now, I agree we need to see it work at a lower 4 level and so one of the things we did is come up with 5 this hybrid where we say, okay, people like transparency 6 on what the price is, and they like first-come, first-7 served. 8 So, we've sold to the Commission and they're 9 buying the pricing on the feed-in tariff, we will 10 publish a price every month, and we will take a queue of 11 a lot of people, 300 something sellers, and we'll 12 publish this price. 13 And we'll let the first person, Laura's the 14 first person in the queue, Laura, can you build at this 15 price? And if Laura says yes, she gets a contract, 16 that's it. 17 Nicole, you're second, can you build? She says 18 no, then I go to the third, JC, can you build at this 19 price? 20 And I go through the whole queue and if I get 21 more than 5 megawatts then what that means is there's a 22 lot of people that can build at this price. And so next 23 month the price goes down by two bucks, just 24 automatically. There's no -- there's no involvement of 25 agencies, there's no involvement of anything else, it's **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 simple supply and demand.

2	If I went through the whole queue and I've
3	published that price, and I got no takers, then next
4	month the price automatically goes up by two bucks. And
5	if I get no subscription, again, it goes up by four
6	bucks. So in two months it's gone up by six bucks.
7	This kind of automatic adjustment is the way to
8	get renewables at the most cost-effective manner. It's
9	the right way that we believe you should price feed-in
10	tariffs.
11	It ensures you get the generation because if
12	you're not getting the generation every month the price
13	keeps going up, it keeps climbing, and climbing, and
14	climbing until you get the generation.
15	And if you get over-subscription, then the price
16	keeps going down, and that's good for our customers.
17	This is our solution to try to balance these two
18	competing problems where you're not getting the
19	generation in the right place or you're not getting
20	you're paying too much for it.
21	So, this turned into a commercial for me, so I'm
22	sorry.
23	MR. LEWIS: And if I could just respond to
24	COMMISSIONER PETERMAN: Or a bully pulpit, one
25	or the other, but it was good.
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1 MR. LEWIS: If I could just respond to a couple 2 of things. One is that the locational benefits value 3 that was calculated for the staff proposal at the CPUC 4 on SB 32 was done by E3.

5 MR. ULRICH: Right.

6 MR. LEWIS: And it was very bold, right, it was 7 eight cents was the maximum kind of anticipated estimate 8 or calculation.

9 The other thing is that I think that Marc and I 10 aren't necessarily that far apart in terms of where an 11 ideal solution could be, and I've had conversations with 12 PG&E and SDG&E, and I think that there's a way to find 13 some good middle ground here.

Fundamentally, the biggest issue with the SCE approach that we have, that the Clean Coalition has right now, and that I think makes SB 32, the proposal in SB 32 very unworkable is that we're just talking about such a tiny amount of capacity, program capacity.

19 If we were talking about more of a German style, 20 where we're talking about getting gigawatts, instead of 21 megawatts then -- and we've identified that there's lots 22 of places to bring gigawatts online, that's great, I 23 think you're -- and the bucket sizes are big, that 24 solution works.

25

But when we're talking about tiny bucket sizes,

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1 the bucket sizes -- the biggest bucket size under the 2 proposed SB 32 position, proposed decision, is going to 3 be something like 40 megawatts. Right, so you fill up 4 40 megawatts and you've got a two dollar -- a two cent 5 per kilowatt hour reduction, you've just completely shut 6 off your market. And that's just not what we're all 7 here for, we're not here to get 40 megawatts online in 8 Southern California Edison territory, right, we've got 9 to be thinking a lot bigger than that. 10 COMMISSIONER PETERMAN: I'd like to hear if 11 Laura and Nicole have any reactions to the --12 MS. WISLAND: My comments were about the 13 fragmentation question. I know feed-in tariff pricing 14 is something where passions are high --15 COMMISSIONER PETERMAN: Well, you should get 16 them in now because otherwise --17 MS. WISLAND: -- so I've just sort of let it 18 flow. 19 COMMISSIONER PETERMAN: Please, what are your 20 comments on the fragmentation? 21 MS. WISLAND: Yeah, so actually my comments are 22 more questions for the utilities and the other 23 panelists, in terms of thinking about fragmentation and 24 are we missing out on the benefits of clean energy 25 policies because we're not better coordinating with **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 other, you know, programs and policies that are out 2 there?

And I really don't know the answer to this. I know some people ask rhetorical questions because they really know the answer, but I don't.

6 You know, if we're thinking about a world where there's going to be a lot more solar on and the peak is 7 8 going to shift towards more nighttime, how are our 9 energy efficiency and demand response programs 10 anticipating that, and changing in order to play a more 11 helpful role and reduce some of the variability of load, 12 which is a huge amount of intermittency on the system? 13 Is that happening, should that be happening, if 14 so, where is it happening?

15 MR. JOHNSON: To be very candid I don't -- you 16 know, we're beginning to have that conversation. I mean 17 the issue for PG&E that we've looked at is, you know, 18 when we talk about distributed generation and we talk 19 about all these issues, we've really been talking about 20 PV, and everyone's very excited about PV because the 21 prices are just dropping through the floor, and they 22 are.

23 We have over 5,000 megawatts of solar under 24 contract at PG&E. The highest peak we've ever had is 25 around 20,000 megawatts. It's going to significantly CALIFORNIA REPORTING, LLC

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reshape what the daily load profile looks like in terms
 of our need.

Now, you know, the thing I think we've started struggling with is as we install Smart Meter, a lot of the conversation is about getting people to shift their usage off of peak. And, you know, we may actually -that peak may be changing.

8 And so to the extent that that technology is 9 there, maybe telling them a different signal than we're 10 telling them today, which is, you know, don't come home 11 and turn on your washer, dryer, your dishwasher, wait 12 until 9:00 o'clock. It may be a different conversation. 13 But, frankly, I think you identify a good issue, which is that there is that fragmentation and we are 14 15 looking at a lot of those programs in silos. 16 And, you know, if you look at the organizational 17 structure of a typical utility, you know, we have a 18 procurement department and we have a customer 19 department. And, you know, we certainly talk to each 20 other a lot, things like feed-in tariffs and solar bleed

21 $\,$ across both groups. But that is a challenge and I $\,$

22 don't -- you know, I think you've identified an issue

23 and I don't think we have a good answer, yet.

24 MR. THOMAS: Just to add to that, this is JC
 25 Thomas, again, SDG&E. One of the things that we are CALIFORNIA REPORTING, LLC

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1 doing is installing battery storage. We have plans this 2 year to put in eight years on our service territory, two 3 large-scale substation level, we're calling it, and then 4 six or smaller distributed to test the technology and 5 see how it works in different environments.

6 Hopefully, they'll be in by the end of this 7 year, and that will be one of the tools that we look to 8 in the future to deal with the issue of having 9 renewables, and shifting to peak later and later at 10 night, especially on the residential side.

And it's going to demonstrate that the storage doesn't have to be on site. And solar doesn't have to be on site. It does not have to be at the location you're consuming, if you look at utilities for a hundred years, generation was always somewhere else, it was never right there on site.

And, hopefully, some of these tools, the battery storage, and our 'Share the Sun" proposal will help demonstrate that you can have resources elsewhere, and utilize a grid that is dynamic and can deliver energy to our customers when they need it.

22 MS. ZOCCHETTI: Anyone else on this question? 23 MS. CAPRETZ: Oh, well, you know, just to piggy-24 back on Craig's comments, I totally agree. Because,

25 like I've said over and over again, there's this

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1 infrastructure divider, green divide, because nothing in 2 your comments suggested that there would be any kind of 3 value in installing infrastructure in these low-income 4 communities of color. I mean, so it's just not part of 5 your decision making process.

6 And so for me, you know, the only opportunity I 7 see that potentially, you know, happening and what 8 really you have seen in Germany in terms of 9 accessibility and affordability of solar is scale. And 10 then when these programs develop and expand in a manner, 11 such that more and more people can participate, and I 12 feel like with the zero to one megawatt market, that's 13 what we'd need.

14 And, you know, I think the struggle is that 15 we're always pushing against the utilities on that point 16 and that there's always a push to go larger because 17 it's, you know, again, that kind of more simplistic, 18 it's least cost, you know, best fit. It's just -- it's 19 ground, mountain, you know, and it's the boundaries of 20 the urban area or in the desert. And so that's 21 something we're constantly struggling with.

And I do, you know, as much as I want to push for all of it now, for some kind of value added now to be in our communities, and I'm still going to push for that. I think, though, long term the answer is scale CALIFORNIA REPORTING, LLC

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and we just are hopeful that the utilities -- and that
 it fits in with Smart Grid, like Andrew's discussion,
 and the micro grid.

You know, UCSD, to me, is something to emulate,
something to aspire to, and I really do think that has a
future.

And so, you know, and final comment is about, 7 8 you know, we paid for all those Smart Meters, we all 9 paid for that, and we don't see any benefit. Not one 10 member of my community knows about that green button, 11 I've now heard about for the first time that, you know, 12 who -- no one knows how to use their Smart Meter, and no 13 one knows they even have it, and no one's benefiting 14 from it, but they paid for it.

15 So, you know, it's like all the time -- yeah, I 16 just feel like that's -- you have to acknowledge some weaknesses there, and opportunity costs, and pushing 17 18 that program forward without having this other dynamic 19 model, and the Smart Grid and micro grid model in place. 20 So, anyhow, but I just -- ultimately, the 21 biggest issue for me is that infrastructure divide. 22 MS. WISLAND: I have another fragmentation 23 question, but I'll wait until you respond. MR. JOHNSON: Well, I -- response to the 24 25 fragmentation, I wanted to address the fragmentation **CALIFORNIA REPORTING, LLC**

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1 question, as well.

2 MS. CAPRETZ: Okay.

3 MR. KELLY: I wanted to address the scale thing,
4 though, real quickly if I might, since that just came
5 up.

6 I mean this issue of scale is an interesting 7 issue and the German example isn't the greatest example 8 for a sustainable development of a program.

9 Their feed-in tariff was mega scale, turned out 10 to be pretty pricy, they ended up canceling it from --11 you know, it was created through government fiat, 12 canceled through government fiat, and it had 13 repercussions on solar prices around the world.

14 So, it has caused some problems, the fact that 15 the Europeans were so far out in front at their feed-in 16 tariff, at such prices that they had, at that scale that 17 they were talking about.

I would rather see us do a measured development over time to make sure that we avoid the customer whiplash of that kind of scale that occurred there.

MS. CAPRETZ: And my only retort to that is, I mean then we're talking a glacial scale, because we already have the Smart Meters in place, and we have these feed-in tariff programs, but they're small and tiny. So, what's the in between then?

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1 I totally agree that you take lessons learned 2 from each of the existing programs in Europe and 3 wherever else and, you know, take the best, leave the 4 rest, I'm fine with that.

5 But I still feel like we're making such small 6 incremental progress and that is not fair to the 7 ratepayers.

8 MR. LEWIS: And just to clarify, the German 9 program is going to put on 15 times more solar than 10 California will this year. It's alive and well, so it's 11 driven prices down, that's true, but it going -- it is 12 getting solar deployments well beyond what California 13 has ever dreamed of.

14 MS. SCHELL: I would comment on the original 15 question was what value are we capturing of renewable energy? And I think one of the -- you know, the issues 16 17 with taking the RAM and putting it into the RMATs, using 18 that for kind of a feed-in tariff is that you're going 19 to get those projects, those renewable projects who can 20 meet that cost threshold. So, it's all really cost-21 based and there's no value recognition, other than 22 what's built in. And, really, I don't think people are 23 bidding into the RAM or saying, well, I'm going to bid, 24 you know, a price that's going to include the value of 25 any of those renewable benefits.

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1 So I think it kind of comes back around to 2 you're going to get the least cost technologies, and 3 that's good for least cost purposes.

4 But for managing the grid and all of the 5 diversity of generation that we need, you may still --6 you know, if there's a policy decision that you need to 7 have diversity of generation types, then I don't think 8 that the RAM, kind of translated into the feed-in 9 tariff, is going to be very effective at all, actually, 10 for that purpose. 11 MR. ULRICH: I'll take that one. 12 MS. ZOCCHETTI: Okay. 13 MR. ULRICH: So, the good news, today, our 14 renewable portfolio is extremely diverse. I heard the biomass guys talk about they didn't have any 15 16 opportunity. Edison has over 40 biomass contracts 17 today. We have over 40 biomass contracts. 18 Half of our renewable portfolio is biomass and 19 geothermal. So, we have lots of room to add solar PV, 20 we have lots of room to add more wind, and biomethane, 21 and other things, there's plenty of room. 22 So, the RAM stuff is really talking about 23 working at the margins. So, don't look at RAM and say, 24 well, hey, it's mostly produced PV, or it's produced 25 hydro, or a few other small things and, therefore, it's **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 not giving us a balanced portfolio.

2 For two decades we've had the largest portfolio 3 of renewable resources in the United States and for two 4 decades that portfolio's been very diverse, wind, solar, 5 solar thermal, solar PV, biomass and geothermal. So, 6 there's lots -- I think people are looking at the new 7 programs as the incremental programs and figuring that 8 that has to have a carve-out for this technology, a 9 carve-out for that technology, and you're not looking at 10 all the stuff that's already been done in the portfolio 11 to date. COMMISSIONER PETERMAN: Marc, ask you a quick 12 13 question. You mentioned that biomass is, what did you say, 40 percent, or half of your portfolio? 14 15 MR. ULRICH: Forty something, over 40 contracts. 16 COMMISSIONER PETERMAN: Oh, 40 something 17 contracts. So what does that equate, though, into share 18 of energy and share of megawatts? 19 MR. ULRICH: So, the share of the renewable 20 energy, it's around six to eight percent of our 21 renewable portfolio. 22 The megawatts, it's roughly about 14 percent or 23 15 percent. 24 COMMISSIONER PETERMAN: Because I agree that you 25 do see every technology represented in the RPS, but **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 diversity, one can have different -- it's a

2 representation or is it -- you know, what does

3 representation really mean?

So, I think it's not -- I would not say it's as diverse as one would argue might be needed for a diverse portfolio. I mean it still is predominantly dominated by wind and PV, I would say the RPS.

8 MR. ULRICH: Well, our portfolio's -- half of
9 it's geothermal and biomass.

10 COMMISSIONER PETERMAN: Okay.

MR. ULRICH: So, it's dominated by geothermal and biomass and then solar PV's the fastest growing piece of it, but it's still the smallest piece of it.

14 COMMISSIONER PETERMAN: I stand corrected. What 15 about yours, Aaron?

16 MR. JOHNSON: Yeah, it's very similar. I mean 17 our foundation, when we started the RPS, we were around 18 11 percent and it was pretty much geothermal, biomass, 19 and small hydro, with a touch of wind.

20 So, what's grown over the last, you know, eight, 21 nine years of the program has predominantly been wind. 22 So, you know, biomass and geothermal have big, and then 23 small hydro, frankly, have big pieces of our portfolio.

24 They're, frankly, not growing, particularly --

25 COMMISSIONER PETERMAN: They're legacy pieces,

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1 yeah.

2 MR. JOHNSON: -- so they will decrease over time 3 and solar will be the big growth area, and wind, for us 4 over time.

5 Just to address the biomass issue, though, I 6 mean I think one of the challenges is, you know, we were 7 talking about the subsidies earlier and I think the 8 challenge with something like biomass is you have to 9 decide what do you want to pay for through electricity? 10 Because what we've seen from a lot of the 11 biomass producers is they're struggling with fuel costs 12 today, and fuel costs are going up significantly. 13 And so, you know, a question we would ask of PG&E is, okay, so if forests need to get cleared, we 14 need that to happen, and if that's going to translate 15

16 into fuel costs for biomass and they're going to go up 17 considerably, should PG&E customers pay, be paying to 18 clear forests and basically paying more than they could 19 for other generation? You know, we can get other 20 technologies cheaper today, should we be paying for that

21 public good, which is forest clearing, which is

22 definitely something we as a society need to do.

But the question is should that be done by PG&E ratepayers by paying extra for biomass, or is there some other mechanism by which that should be done?

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1 COMMISSIONER PETERMAN: That's fair enough. I 2 think one of the challenges is finding what the right 3 efficient procurement is because it would be also 4 inefficient to, if you can meet two objectives with one 5 activity, for an incremental higher price, which might 6 be cheaper than doing them each, individually.

7 And I think it comes down to systematically 8 who's able to -- we talked a little bit about the 9 ability to actually do that calculation and figure out 10 the optimal mix of who pays and when but, yeah, a very 11 valid point.

MR. KELLY: Well, if I could just follow on that, this is Steven Kelley, with IEP. As kind of a market watcher, anyway, most of the geothermal and biomass are the existing resources, which were the old QF resources. There have been very little procured in the RPS-related RFOs over the last four or five cycles, or whatever it was.

When I think of geothermal and biomass, I don't think of technology, per se, but I do think of product which it's kind of based on. And I come to the conclusion that very little base load renewables are actually getting procured. A lot of the other types are getting procured.

25

At the same time they're increasing concerns

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1 related about intermittency.

2 So what has always puzzled me is why there isn't 3 a balance against the rising intermittency by the 4 procurement of the more base-loaded units. And I don't 5 see that happening and it's always puzzled me.

6 MR. ULRICH: So one of the problems we've had, 7 for four years the utilities have been trying to get an 8 integration adder that we could use in our valuation 9 process, so we can look at intermittency of 10 photovoltaics, or wind, and then say, hey, it's the 11 geothermal, or the biomass, or the solar thermal that's 12 more stable, so let's at \$5 a megawatt hour to the cost 13 of the intermittence.

14 And to date the Utilities Commission has forbidden us from using that integration adder. And so 15 16 we -- and the reason I use these inflammatory words, 17 like "forbidden," the reason they said you can't use the 18 integration adder is because while we know there 19 probably is one, we don't know what the costs are, so 20 we're not going to allow the utilities to come up with 21 that adder on their own.

And I think that's unfortunate because we could be providing value or at least incorporating more of the costs into the least-cost, best-fit, if we were allowed to do so.

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1 MR. JOHNSON: But even if you look at 2 conventional generation, we're not buying a lot of base 3 load generation there, either. And so I certainly hear, you know, utilities raise -- we raised the concern about 4 5 the intermittency of the resources. However, procuring 6 a bunch of additional base load resources is also 7 potentially a problem because what we really need are 8 flexible resources that can ramp up and down really 9 quick, and turn on and turn off and, generally, these 10 resources haven't had those characteristics, either. 11 COMMISSIONER PETERMAN: And I think that was a 12 good point that Heather made, from the ISO, in one of 13 the earlier panels about thinking about dispatchability. 14 And oftentimes I think base load, and not that nuance. 15 And also, to Marc's point, similarly in the RPS, 16 in terms of cost containment or what you can consider in 17 terms of cost containment is generation cost. It's not 18 necessarily the integration costs or the transmission. 19 And so, again, getting at ultimately what's the 20 total totality of cost drivers. 21 I suggest we take -- we do something a little 22 bit different, now, and we'll come back to all the 23 panelists at the end of final comments. But we've got 24 one member of the public who wants to either ask a 25 question or make a comment, and then I'd say we open it **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 up for about ten minutes to the audience, to see if they 2 have questions for the panelists. Is that okay with 3 you, Moderator?

4 Oh. Oh, and first, most importantly, our 5 Chairman, it's open to him to make questions and 6 comments as he wishes, so go ahead.

7 And after that we'll hear John Larrea, with the8 California League of Food Processors.

9 CHAIRPERSON WEISENMILLER: Yeah, I was going to 10 say, actually, geothermal can be very dispatchable once 11 you get into the characteristics. I know at one point I 12 tried to negotiate a dispatchable contract with geysers, 13 with PG&E, and we couldn't get there.

But we could negotiate what was a very dispatchable contract with Crockett, which is a gasfired unit, with PG&E.

And part of the difference was that with Crockett, as a gas unit the capital costs are relatively low. So, we could basically go to the banks and say even if the project's never operated, the capacity payment would cover the debt.

22 On the other hand, the geothermal is so, you 23 know, capital intensive that you can't possibly 24 structure a deal that way, or at least in that -- in

25

negotiations.

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1 You know, what PG&E and I both found was that 2 the loss of revenues to the geysers, relative to the 3 value of dispatchability, you just couldn't make it 4 work.

5 So, again, but having said that, I was very 6 surprised because before Unical told me, I would assume 7 the geysers could not really be that flexible, but it 8 can. Anyway, geothermal can be very flexible if you can 9 actually structure the deal, but I don't think you can 10 given the cost structure.

11 COMMISSIONER PETERMAN: I think one thing that 12 you sort of touched on, and a lot of people touched on 13 here is that I think we're sort of making an assumption 14 that the investment community is this static institution 15 that we have to continuously adapt to.

And I think one of the things to generally think about is how can we get the investment community thinking differently in terms of what they're willing to invest in, over what time horizons?

Because, ultimately, that's got to be an area which is going to be flexible as well, and we are dealing with new generation and it's not going to be the same investment patterns as previously.

24 John Larrea? Please come up.

25 MR. LARREA: Well, thank you. I don't have so

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1 much of a question, I just wanted to make a public comment, so it won't -- it will be very brief. 2 3 I'm John Larrea, with the California League of Food Processors. And I just want to let you all know 4 5 that I haven't been in the deep end of the renewables 6 pool here, so this is -- I've learned quite a bit here today and I plan to attend a lot of these in order to 7 8 know more, because I know it's going to affect our 9 industry. 10 One of the things I'd like to say is that, you 11 know, I miss the ISO being here. I think they would 12 have been involved in this conversation, too, especially 13 when you're talking about the scales, and about the need 14 to expand the renewables. I know that they have a good 15 position on that. 16 And I would urge you to -- you know, they were 17 subtly cautious about how to expand this and how to move 18 forward, and we are in complete agreement with them, 19 because reliability is one of our biggest issues. 20 And the issue is really important to us because 21 our reliability needs occur right at the height of the 22 season, in the middle of the summer, because this is 23 when our season begins. And it starts about the middle 24 of June and ends about the end of August, and sometimes 25 into September. And we cannot afford to go down for any **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

more than, say, a maximum of six hours, otherwise we lose tens of thousands of tons of vegetables that are going to rot in the field because of the way that we operate our efficient systems. And they are very efficient, but they have to keep operating at a steady pace.

So, as we look to incorporate renewables, we begin to -- you know, it give me some pause when we started to talk about the idea of displacing fossil fuels.

11 Now, we're not against that, we do utilize some 12 renewables. And in fact, I would invite all of the 13 Commissioners, including the new one, we are going to 14 start up our process pretty soon, if you'd like to take a tour of one of our facilities when they're operating, 15 16 we can show you the types of renewables that we have 17 incorporated into our systems, and that they are working 18 to help us to become more efficient and to reduce our emissions. 19

20 So, I'll be contacting you again, if you'd like, 21 it's a very interesting tour if you've never been 22 through one.

23 Secondly, it's just a kind of a personal 24 comment, and that is when you're talking about fossil 25 fuels, please, if you're going to talk about the CALIFORNIA REPORTING, LLC 10 is a back of the formation of the formation.

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benefits and looking at the public benefits of renewable
 energy, and renewables here in California, please do not
 ignore what's happening in the natural gas markets.

They have changed significantly since we put AB 32 through and since we've been pursuing renewables, and they've changed even more in the last two years.

7 These markets out there, now, I don't know 8 whether California's going to be pursuing this, but I do 9 know that the other states out there are investing a lot 10 of time and energy into determining how best to develop 11 the infrastructure associated with this natural gas that 12 we have.

I can give you one example. I used to work for the Williams Companies back, up until 2007, and they had a pipeline running through here, the Pacific Connector, which was going to be an LNG port in Jordan Cove, that was going to deliver -- and PG&E should know about -that was going to deliver LNG up through here and into California, and we had a number of those, too.

20 Since that's changed around, the LNG is no 21 longer there, but the Pacific Connector, even though 22 Williams has backed out, I believe, has now changed 23 direction. Now, they are looking at making it an export 24 because of the amount of natural gas and the price of 25 natural gas in Asia and in China.

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1 So, you know, there's a lot of changes that can 2 go on. We're not saying that renewables are anything 3 bad. In fact, we are looking at them, too, we're 4 looking at biogas, we're looking at biogeneration. In 5 fact, we've got a couple of our members who are actually 6 involved in the latest one.

But you need to take into consideration 7 8 industry, and how it's going to affect us, too. And if 9 there's a way to incorporate both, without affecting our 10 particular markets, and to keep us productive as you 11 can, at the least cost that you can, I would urge you to 12 again review the benefits associated with renewables, 13 but also take into effect, you know, how can you 14 companion up with fossil fuels without, especially, 15 natural gas, because that's going to be the -- as far as 16 we can see, it is the transition fuel that you need to 17 be able to get to the type of energy efficient world 18 that you want, and we just can't do it all in one swoop. 19 Thank you.

20 COMMISSIONER PETERMAN: Thank you. And I'll 21 say, I don't know if you were here in the morning, but 22 we did have an ISO member on both the panels, and there 23 was also some research presented by UC Berkeley and 24 talked about looking forward in 2030, what the mix of 25 renewable generation and gas is.

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1 And for the most part it's still a significant 2 amount of gas providing integration and firming support 3 for renewables.

4 But one of the questions we also talked about 5 earlier was, okay, if you look at firming as an 6 attribute which can be met by a number of any storage devices, whether that's storage of natural gas, or 7 8 batteries, et cetera, what are some of our flexible 9 options. 10 But I also appreciate your point about different 11 industries have different reliability needs. 12 And I think a challenge I imagine the ISO 13 struggles is how do you, acknowledging that different

14 parties have different reliability needs, because I 15 could probably go without my power for six hours, to be 16 honest, I don't keep much in the fridge. You now, so 17 it's like how do we accommodate someone, like myself, 18 that would be willing to use less, but make sure that 19 someone, like yourself, has more.

20 Any other questions?

21 CHAIRPERSON WEISENMILLER: I was also going to 22 encourage, in terms of food processing, obviously, in 23 the eighties CHP was the major thing in food processing. 24 Crockett is cane sugar, or sugar. Certainly,

25 Gilroy was garlic and basic American food.

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So, you're talking about, in the PG&E service
 territory, their really large projects were all food
 processing.

4 COMMISSIONER PETERMAN: Yeah. Anyone in the 5 audience or on the phone who would like to ask a 6 question or make a comment?

7 Mr. V. John White.

8 MR. WHITE: Thank you, Madam Chair, Mr. Chair, 9 John White from the Center for Energy Efficiency 10 Renewable Technologies.

11 This is a very important discussion that you've 12 been having today and we've been following it. There's 13 been a few other things going on.

But I think that we have a long way to go in a couple of areas. One, that I would really commend and it's something you and I have spoken about, to the Commission to use your authority to gather and collect data that would help elucidate the question about value, particularly for DG.

20 There's sort of a black box associated with 21 customer load profiles, and things of that nature, that 22 are not readily available to the public. This is data 23 you all can ask for, and receive, and hold confidential. 24 Dr. Schell, here, has done some of this work 25 already in a number of respects, it's very valuable, and 26 CALIFORNIA REPORTING, LLC

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1 publicly vetted in a number of technologies.

2 And the importance of this is because what we're 3 hearing and what we're now understanding is that there 4 is differences in the value that each of the renewable 5 technologies provides.

6 And as we go further over the divide from fossil 7 fuel and nuclear to a different kind of future, with 8 more renewable penetration of all kinds, those renewable 9 resources need to do more work than simply being pretty, 10 and green, and showing up.

11 Okay, and so we need -- and the fact that we 12 have an unbalanced portfolio in terms of recent 13 solicitations, particularly in 2011, is a sign that what 14 we've really got going on is least cost, least cost, not 15 least-cost, best-fit.

16 Okay. And I appreciate Marc's point about the 17 Commission not wanting to let there be an adder, but 18 maybe it's a qualitative adder to start with. You know, 19 what we know is that there's different value that the 20 technologies have.

21 What we need is a disciplined way of going about 22 that. Now, our friends at the PUC have absolutely 23 refused to do that. They like the RAM because they 24 don't have to do any work.

25 And yet the RAM, and they've got an idea in CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 their head that all we're thinking about is types of 2 products, but we've got types of technology. 3 So, base load as available. Peak isn't the right way to think about this. It's bio -- in the case 4 5 of distributor resources, bioenergy, PV, maybe some 6 geothermal, maybe some small wind. What we're getting 7 is all PV. We're getting all PV in the RAM and it's 8 this new one that we're going to see, and we're going to 9 get all PV, we've had all PV so far. 10 So, that gets to the other problem in addition 11 to the need for valuation and I must say, Andrew 12 McAllister's appointment is welcome news in this regard 13 because he and I have talked about this. So, I extend 14 my congratulations to him, I think he can help you with 15 this assignment. 16 The other thing we need to do is recognize the 17 siloing that we have going on in our policies and within 18 the utilities. 19 So we have resource adequacy, which is about 20 mostly buying existing capacity and what we pay for it. 21 And we have long-term procurement, which I think 22 is mostly about buying new gas. 23 And we have renewables. Now, we have the 24 flexible capacity. 25 And so, what I think we need to start doing as **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 we move forward is to integrate these programs so that 2 utilities cannot just have a procurement manager whose 3 job is only to buy kilowatt hours, at the least cost, 4 but a procurement plan that actually is helping meet the 5 resource adequacy.

6 So, you look at resources that can do resource 7 adequacy, and RPS, and greenhouse gas, which would give 8 you -- you know, again, it might need to be qualitative 9 at the beginning, but I think this Commission can play a 10 significant role in helping sort that out.

And I think getting the agencies to talk to each other about how to combine. And in our comments at the ISO, we suggested that one of the problems with flexible capacity is that we need a new product, and said we've got too many people self-scheduling.

And so maybe one of the conditions for the resource adequacy proceeding is that if you're going to be a resource adequate resource, you've got to not selfschedule, so you get a deeper stack.

20 So, there's the different technical and policy 21 things.

I think we all, collectively, want the same goals. I know the utilities are focused on costs for a good reason.

But I think this debate that you're having

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1 today, and the good conversation that's been had all 2 day, gives us a sense of needing to move forward in a 3 somewhat different fashion than we have in the past. We learned from that experience, but I think this 4 5 Commission can play a role at pulling this together. 6 I think you can also work with your sister 7 agency, the Air Resources Board, to get at, say, the 8 value of biomethane, which has seemingly alluded the 9 PUC, they don't understand it, they don't care about it, 10 they don't think it's their job. And, yet, this is a 11 very important environmental goal for us in the State. 12 Similarly, different renewable technologies, 13 solar thermal, geothermal have value that isn't 14 reflected, necessarily, in the way the bids are going. 15 So, I think we have much work to do, we have a 16 wonderful body of experience and terrific portfolios to

17 build on.

18 As we move forward, I just think we need to 19 adjust a little bit and think about what we're doing in 20 a more holistic way.

21 And I thank you for the opportunity for me to 22 have a few words.

23 COMMISSIONER PETERMAN: Thank you.

24 CHAIRPERSON WEISENMILLER: Do any of the

25 utilities want to comment on the mixture of what the

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1 results agreement has been?

2 MR. ULRICH: Yeah, I would. V. John, I have a 3 ton of respect for, but I wouldn't use one solicitation 4 as, oh, my gosh, everything's going to be PV forever, 5 for a couple of reasons.

6 One is PV has lost a lot of demand in Europe 7 because of the solar coasters going on, and so they're 8 seeking to get rid of excess panels in California, so 9 we're getting very competitive PV bids. But don't 10 forget there is a best fit part of least-cost best fit, 11 and we are keeping our eye on the ball. We are not 12 going to load ourselves with just a PV portfolio.

13 Particularly, because one of the things we're pushing at the CAISO is that the integration costs ought 14 to be allocated to folks who are causing the integration 15 problems. Ultimately, load will pay for it. But what I 16 17 don't want to happen is Aaron, over at PG&E, build an 18 entire portfolio of just photovoltaics and then my 19 customers in Southern California Edison get to pay 40 20 percent of all the integration costs.

21 So, we keep track of what the balance is of the 22 renewable portfolio, as we're doing things.

I'm already -- the way the CAISO has changed the deliverability and resource adequacy has already made me rethink the value of solar photovoltaics because a

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generator before, when they put in an interconnection request, they could have confidence they could provide three attributes. And we're buying, essentially, three attributes, energy, capacity, and then a global green attribute, which has a lot of different benefits to it.

6 But a generator used to be able to have7 confidence they could provide all three.

8 In this new, queue cluster process that the 9 CAISO has done, they know they can provide energy, they 10 know they can provide the green attribute, but resource 11 adequacy, now, is in question.

12 And so if resource -- if a seller can't provide 13 resource adequacy, one of the reasons I spend more money 14 for solar PV, even though prices have tanked for solar 15 PV, it's still, at the end of the day, more expensive 16 than wind and any other -- almost any other renewable 17 technology.

But the reason I pay to do PV is because I give it these TOD factors, which anticipate a lot of high value during the peak period.

Our planning folks, and we've been working with them, have already come to me and say, hey, Marc, slow down. We think that the TOD factors, if we reran them today, and what we pay today is three times the contract price during the summer on peak.

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1 They said if we reran that today, based on the 2 build out, it would not be anywhere near three times. 3 And if it's not three times, PV's not going to win 4 anymore.

5 So, I wouldn't use the most -- latest results as 6 a bell weather that something's broke, we got to fix it. 7 What I would do is we do a lot of outreach. We are 8 missing in the RAM some good biomass bids.

9 I don't want to go after a specific technology, 10 I'd rather go after a characteristic and let any 11 technology that has that characteristic compete for that 12 characteristic.

It's sort of like saying, look, we want storage, and that's right we do. But we don't necessarily need battery storage, we need storage, and let all kind of storage things compete against that.

But what kind of storage? Is it, you know,
storage for frequency, is it storage for peak shaving?
That's -- you define the characteristics and then we let
all of the technologies compete over that

21 characteristic.

And so the Commission has said they -- and maybe you don't agree, they've broken it up into peaking, offpeak, and then as available or base load. That's their attempt to make sure there's a home for each of the CALIFORNIA REPORTING, LLC

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1 types of characteristics.

2 So, in my opinion, I hope that the biomass folks 3 avail themselves of their opportunity to bid in the RAM 4 and provide contracts -- get contracts under RAM. But, 5 as of today, they're not using that avenue.

6 MR. LEWIS: If I could just add on to Marc's 7 comments, and playing off of John's, too, I think it's 8 really important to realize that the biopower industry 9 is highly fragmented within itself.

10 And I thought when the gentleman was speaking 11 from the Food Processing Trade group, that he was going 12 to be talking about the need to provide some 13 opportunities for biogas generation. That is really a 14 tremendous opportunity for food processing, and ag, food 15 and ag processors.

16 That market segment of biopower's completely 17 different than the biomass sector that Marc and Aaron 18 have been talking about.

And the cost structures for the biogas folks are far higher than the biomass people, because the biogas technologies have not been deployed with any kind of scale at all in California or, frankly, anywhere in the United States. But, really, in California it's almost zero.

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So, at the start of a technology, when you want **CALIFORNIA REPORTING, LLC**

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to get that technology going, you have to provide some additional incentives. There's just no way that a new technology can come in, from day one, and be costcompetitive with a technology that's been around for a hundred years.

6 So, it's really important that we do see that 7 there's a fragmented market here. I think part of the 8 goal of this session today was to find out how do we get 9 opportunities for biogas, and biopower, generically.

But what we really need to focus on is how do we get opportunities for biogas, and that would be food and ag operators that can take that waste stream, that's right there on site, and generate electricity, and deliver that to the grid.

15 COMMISSIONER PETERMAN: And we're going to hear 16 a response from John, and then after that if there's any 17 more public comment, then after that we're going to go 18 around, starting with Aaron, since he was with his mike, 19 for final comments from the panel, because we're at ten 20 to 5:00.

21 And I'd ask in your final comments to please 22 offer your first recommendation that we should consider, 23 as well as any other takeaway you want to leave this 24 group with, and that leaves you a minute, give or take, 25 per person.

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So, John, you're up next.

2 MR. LARREA: I just wanted to say biogas is one 3 of the things that we are considering quite a bit. 4 We've looked at it and we've just come to the conclusion 5 that, yes, you can set up some biogas digesters in the 6 various areas. Dairies are probably the best for that, 7 in terms of that, but they're always small and it takes 8 a lot to clean up the gas to make it saleable for that. 9 But for us, we actually came up with an idea of 10 a central biogas unit, where you have a very large 11 facility that can then -- because we are so centrally 12 located within the valley areas, we can take this mass 13 into them and receive credits. Even though we can't actually use the gas, others can use the gas, it would 14 displace it. 15

But we've gotten absolutely no traction on this, not from the ARB, nor from the Legislature. You know, and we've been trying to work with them because we do have these kinds of issues and we can contribute, but we need some help out there to get people to consider some different ideas.

You know, a large biogas generator, one that will take it from five, six, seven different facilities that can truck it in, and bring it to them, would probably work better for us than a tiny one, you know, a CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 hundred of them on various places because we only
 operate partially in the year, we only operate four
 months out of the year. So, it really doesn't make any
 economic sense for us to put one on site.

5 COMMISSIONER PETERMAN: John, you should follow
6 up after this with Tamara, because SoCal Gas is doing
7 some interesting work in this area.

8 Anyone else want to offer any public comments,9 either in the room or on the phone?

10 Going once, going twice, going back to Kate.

MS. ZOCCHETTI: Did you want to go around the
room -- the table, I'm sorry, yes, not the room.

13 MR. JOHNSON: Final comment. My final comment 14 is if you listen to a public policy debate about 15 renewables or the energy sector in this State, you would 16 think things were really, really broken. And I think 17 it's important to step back and think about the progress 18 that we've made and that we're making.

We've gone from 14 percent, to 16, to 19 percent renewable. That's not fast enough for some people, but that's tremendous progress in a decades, if not centuryold business.

And we're making great strides, we've put a lot of programs in place, and that was one of the elements on my slide, the first slide I put up.

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1 And I think the key takeaway for me is recognize 2 the progress we're making. Policy has been moving much 3 faster in the State than implementation. We need some 4 time to implement all the many, many policies, the many 5 programs, the many solicitations that have been put in 6 place, give them an opportunity to work. They are 7 actually working.

8 MR. THOMAS: Okay, and I'll be brief. One of 9 the things and it struck me is something that Nicole had 10 said earlier about infrastructure in certain 11 communities. And I think one of the things that we need 12 to look at is not so much what are we building from a 13 renewable stand point, but what are we replacing, what 14 are we displacing.

15 For example, DWR contracts that are coming 16 offline, are we replacing those with renewables, and we 17 previously had natural gas?

In our case, in San Diego, we were able to retire a 50-year-old power plant as a result of a transmission line dedicated to renewables. And we had some peakers in there, but we took down a 50-year-old power plant that was using once-through cooling. And we did it with the help of the Environmental Health Coalition, and many others in San Diego.

25 I also want to make sure, I guess some closing CALIFORNIA REPORTING, LLC

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points, we are supporting more customer choice. Those that want to be 100 percent renewable, they don't have to be 33 percent, so we're trying to unlock the door to that for those that want that as a choice.

5 Improving transparency for our customers, and 6 rate, the rate design and then, of course, like I said, 7 let's take a look at what we're replacing from a fleet 8 stand point.

9 I'm sure all utilities have replaced some power 10 plants or replaced some power plants over the last 11 decade.

MS. CAPRETZ: I'm Nicole Capretz, Environmental Health Coalition. Yeah, I'm just a broken record and I'm all about equity. And in terms of diversity, diversity of benefits and making sure that everybody gets lifted up by this new, you know, transition to a green economy.

And then the loading order, I just really can't stress enough how I feel we're not implementing the loading order in a meaningful way, and partly it's because of the division between all the programs within the utilities. But I think it's internal and external, it's not just the utilities fault, I feel like there's still a lot of work to do on that front.

25 MS. WISLAND: Laura Wisland, UCS, I have a CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

1 couple points. I never got to ask my fragmentation
2 about -- and so this is something we can all take home
3 with us.

But one of the questions I have is as we're thinking through revamping the distribution grid for more solar, and more DG, are we also layering on top of that thinking through revamping the distribution grid for electric vehicles?

9 I know there's two different proceedings and we 10 should make sure that as we think through upgrades that 11 they work for both, or if they don't work for both, we 12 fully understand why.

13 In terms of what the Energy Commission should be 14 thinking about, you know, I think we should -- we should 15 think about whether we're prepared to move forward on 16 additional clean energy policies, when we're ready, 17 without being able to fully quantify all the benefits, 18 because I think that we've moved pretty far, and in a 19 really positive and good direction without having to do 20 that.

And so, while I'm not saying that we need to go and get another RPS bill next year, I think we can't wait too long before we start thinking about what it looks like, because we all know it takes a while.

25 And then, finally, I just wanted to respond to CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 the gentleman that works with the Food Processor 2 Association. I just have to say, I don't believe that 3 natural gas is a bridge fuel. You know, I really think 4 that if we decide to spend the money on the 5 infrastructure to extract these additional resources 6 from the ground, which I'd hazard to say are way more expensive than building a renewable energy facility, 7 8 that we are making a choice to put that money there, 9 instead of here.

10 And that if we build those facilities and we 11 build those additional gas plants, we are going to have 12 sun costs for at least the next 40 years. So, just got 13 to say that.

MR. MC ALLISTER: Yeah, the hedge value of diversifying hasn't gone away, so I would second that. Just because natural gas prices are cheap now, doesn't mean they're going to be cheap at any particular point in the future.

And, in fact, if you, you know, make an investment, you take the risk into account. And if you don't do that, then you're going to end up in a problem. Say, you know, maybe there's a bubble happening, who knows.

And we haven't actually talked much about
natural gas, but we probably should have. You know, a
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1 lot of the discussion here's been about electricity, 2 because electricity's a particularly difficult 3 commodity. And, you know, the fact that it's no easily storable and all that, and the reliability needs are so 4 5 high, makes it particularly unique. 6 But, you know, we could have a lot of these 7 discussions about the ancillary benefits around natural 8 gas, too. And particularly, you know, I noticed the 9 PG&E presentation said that the various emissions from 10 power plants weren't that important. 11 But actually, you know, natural gas is probably 12 one of the big area sources of certain emissions 13 throughout the State. 14 And so I think it's not quite so simple if you 15 look at energy more broadly. 16 So, I quess I would just say, again, electricity 17 is somewhat of a difficult commodity, but we have lots 18 of technology that allows us to manage that commodity 19 much more tightly. 20 And if we're making long-term planning decisions 21 then, certainly, implementation shouldn't be expected to 22 be in lock-step with policy. But the investments that 23 are going to be made, that are being made now, and that 24 are going to be made very nearby in the future are going 25 to be with us for a long time, and so we have to make **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

sure they kill several birds -- bad analogy, kill
 several birds with one stone.
 So, we kind of have to have the near term and

4 the long term in mind, wasn't talking about wind energy, 5 by the way.

6 COMMISSIONER PETERMAN: We don't permit that,7 just solar thermals.

8 MR. MC ALLISTER: Right, sorry. So, I guess the 9 overarching point with, you know, keeping on the theme 10 of the day, which is the benefits of renewables, you 11 know, I think we know the technical sort of distribution 12 system part of it.

13 You know, a lot of the studies, there are a number of people, E3 and others have done studies, 14 15 there's more in progress. Those are kind of --16 certainly, there are methodological decisions to make in 17 those studies, but they are basically data-based and you 18 crunch them out, right. And you can defend your 19 methodology or go for a different methodology, but you 20 can get numbers there.

21 So, a lot of the ancillary, the other benefits, 22 even the non-technical, or the social, the health, all 23 these other benefits we've been talking about, even the 24 fire stuff, you know, quantifying those is difficult and 25 may be very difficult.

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We know that those benefits are non-zero, so if we move forward with them being non-zero, then we know we're about as wrong as we're going to get.

So I think to build on V. John White's point, you know, we -- I sympathize with some of the discussion today where, you know, it's a hole we could just travel down and travel down and never get to the bottom of.

8 But at the other -- we could limit the amount of 9 effort and still come up with a better number than what 10 we've got. And I think that's important if we have the 11 -- if the policy environment continues where we're 12 actually going to need -- you know, we want more 13 renewables at all scales, for diversity's sake.

14 In just a more philosophical discussion, I think a lot of the -- you know, often, and I see why this is 15 16 the case, and if I were in their shoes, I might do the 17 same thing. But often the utility perspective is, you 18 know, we've got it under control, we have these 19 processes, we have all these programs, leave it to us 20 and we'll procure under a rational set of criteria, and 21 we'll know the cost, and it's as efficient as the 22 system's going to get.

And I guess I just have to challenge that and say, you know, when we let a market work and, granted, with the investor-owned utilities we have a monopoly CALIFORNIA REPORTING, LLC

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situation, and so there's a reason for that, for public
 policy purposes.

3 But we also have a lot of expertise out there that could be making -- if we succeeded in using the 4 5 sort of -- if we succeeded in having a more distributed 6 sort of decision making on what kind of generation goes 7 in where, based on information that was more public, I 8 don't think we could have, actually, a lot of better 9 outcomes and that would be good for the utility and good 10 for the marketplace. 11 And so I think there's a lot -- there's a lot of 12 richness here that we're not going to get to today, but 13 I just think we're all on the same boat, and we all 14 ought to be working together on these problems. So, 15 thank you. 16 Thank you. Tamara Rasberry, MR. RASBERRY: 17 again, from Sempra Utilities -- Sempra Energy Utilities, 18 and I'm glad that four and a half hours after I 19 mentioned it, at the very end of the discussion biogas 20 was finally discussed, and natural gas. So, thank you, 21 sir, from Food Processing, and making sure that that 22 was -- that issue didn't go unnoticed. 23 And I did want to point out, too -- well, I just 24 wanted to say for the record that as the largest natural 25 gas distributer in the country that SoCal Gas does **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417

believe, obviously, in the power of natural gas, and as
 a bridge fuel, also.

And it has an initiative program we've been developing and pursuing over the last couple of years to promote and encourage, and reclassify gas as a clean energy. And I use that term very broadly and I'll just leave it at that.

8 So, and I also wanted to show the slide that I 9 could not present because of my two-slide limit, was 10 a -- and this is for you, Craig, to show the economy --11 the economics behind biomethane, and you need very large 12 sources to bring the cost down. This goes to Steve's 13 point, also earlier, that the utility investment drives 14 the market and that's a message that you've always said, 15 that you need market certainty in order to develop and 16 to market.

And so for dairies, you know, you need 80,000 knows to make the biomethane economic, and we only have five dairies in SoCal Gas territory that has more than 8,000 cows.

And for wastewater treatment plants you need, you know, like 10,000 SCFMs to meet the biomethane price to make it economic.

24 So, the challenge then is, you know, like I

25 said, regulatory certainty and investment in the market,

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but we do want to see biomethane developed here in
 California.

So, I will ask you to please pick up my
presentation outside, with my missing slides and talk to
me later, thank you.

6 COMMISSIONER PETERMAN: Tamara, I want to ask 7 you, since you feel like it wasn't discussed as much, 8 why do you want to see it developed?

9 Because you've talked about what the programs 10 are, but in terms of the focus on environmental 11 benefits, and so I just wanted to make sure that we got 12 those out.

I know one that I've heard, possibly, is dealing with landfills, and methane emissions, but I wanted to make sure we got your point on the record about what the additional environmental benefits of the resource you feel are not being accounted for?

18 MR. RASBERRY: Well, the alternative is to 19 flare, and so we just see that instead of flaring it, 20 using that resource to create electricity, instead of 21 just flaring it because you can't inject it, is the 22 benefit.

I mean, I'm not a -- I'm really not the policy person, so I don't know what the -- you know, what the value is of displacing flare, rather than injecting it **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 into the -- into the pipeline, but I do have --

2 COMMISSIONER PETERMAN: There's the 3 representative from ARB, who was on panel one, I think 4 spoke to how ARB and the Cap and Trade Program does 5 provide some incentive for consideration of that for the 6 reduction in greenhouse gases from the switch, to the 7 flare, to the injection. But I wanted to make sure we 8 got that point on the record.

9 MR. RASBERRY: Yeah, we did talk to ARB about 10 this when we did our advice letter a couple of years 11 ago, but there are no government incentives for 12 injectable pipeline. Most of that's on site, but not 13 for being injected into the pipeline.

And so one of our points that we've raised in front of the PUC is that one economical renewable natural gas injection project has an annual emissions reductions of 56,250 metric tons of CO2 equivalent based on 411 tons per day of landfill diverted food waste that is anaerobically digested, and this is the equivalent of approximately 11,000 passenger vehicles off the road.

21 So, we just say that the resource is abundant 22 and available, and we want to be able to use it. Thank 23 you.

24 COMMISSIONER PETERMAN: Thank you. Steven?
 25 MR. KELLY: Yeah, this is Steven Kelly with the CALIFORNIA REPORTING, LLC

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Independent Energy Producers Association, and I guess
 I'd just like to finish with one concern and then one
 observation reiterated again.

And I want to make clear that while I'm not opposed, and I actually am enthused about good research, I do -- I am concerned that we are entering an era where we are facing kind of policy paralysis through analysis and that we be careful to avoid that kind of outcome over the next four or five years, as we sort out some of these issues.

And then, secondly, I just reiterate that from a commercial perspective how important regulatory certainty and procurement transparency is to -- are critical to making the investment dollars follow policy directives.

16 If that linkage is not there, then we'll be back 17 in ten years talking about these policy initiatives 18 again, because people will not have made the

19 investments.

20 COMMISSIONER PETERMAN: Thank you.

21 MR. LEWIS: So --

22 COMMISSIONER PETERMAN: Your summary point and 23 recommendation.

24 MR. LEWIS: Oh, sorry, I thought you were

25 talking to Steven.

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So, yes, I've got four points, scale, transparency, interconnection, locational benefits. If we get those four things right, we will have a beautiful situation here in California and beautiful future for California ratepayers.

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6 Scale, it was -- I think Aaron was the one who 7 said we've gone from 14 percent to 20 percent RPS in ten 8 years. That's less than one percent a year. Now, some 9 people may be happy with that, I'm not. I'm not 10 satisfied with that.

Steven said, let's have a market that grows, you know, kind of at this moderate pace, not do the German thing. I would say the Germans got it right. And California's got to lead the way in the United States and we can only control, the people in this room can only really influence what happens in California.

17 In California, we need to make it a big market, 18 we need it to scale, we need that scale to drive down 19 the pricing, and then other markets will open up and the 20 business will move across the country.

In terms of the German situation, the German --I forgot to mention this earlier, German rooftop solar is priced, today, between 7 cents and 11 cents per kilowatt hour.

25 California hasn't even dreamed of doing that out CALIFORNIA REPORTING, LLC 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417 1 in the middle of the desert. And the reasons that the 2 Germans can do rooftop solar, commercial rooftop solar 3 at between 7 and 11 cents once you adjust for tax 4 benefits, and you adjust for solar quality here, is 5 because of scale. And so we've got to scale wholesale 6 distributed generation, which is the way the Germans do 7 even their rooftop solar. 8 It comes down, interconnects directly to the

9 grid, 100 percent of that energy is delivered to the 10 utility.

11 Transparency, my example here is 12 interconnection. I didn't complete what I was talking 13 about with the Sacramento Municipal Utility District --14 COMMISSIONER PETERMAN: We're wrapping up, 15 though.

16 MR. LEWIS: Yeah, I'm wrapping up.

17 COMMISSIONER PETERMAN: Okay.

18 MR. LEWIS: Two guys, two months, they did 100 19 megawatts worth of projects. A hundred megawatts in 20 Sacramento, Sacramento's territory is equivalent to 2.5 21 gigawatts across the State of California.

Okay, they did that, two guys, two months. They did all the interconnection studies for 2.5 gigawatts equivalent on distribution grids across the State of California.

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Okay, we can do a lot better than what we've
 done so far to date.

3 Locational benefits, it is the key driver to 4 making sure that we have the proper price signals going 5 out to the marketplace, so that what Steven was talking 6 about, developers can make sure that the projects are going to the right place, and that they're getting 7 8 compensated for putting those projects in the right 9 place, based on the value that they're providing to 10 ratepayers. 11 MR. JOHNSON: For the record, that was 14 to 19 12 percent in the last two years, with 18 projects under 13 construction for 3,000 megawatts. 14 COMMISSIONER PETERMAN: Duly noted, on the 15 record. Moving on, next? 16 MS. SCHELL: Yes, Lori Schell, UC Irvine and 17 Empowered Energy. I think the takeaway is that we need 18 a diverse portfolio. 19 Marc mentioned the ability, the integration 20 ability and kind of the issues surrounding the 21 quantification of that. 22 I think my recommendation would be that we focus 23 on a handful of characteristics, be they integration, be 24 they the ability to avoid criteria pollutants, or 25 greenhouse gases, or health benefits. I think health **CALIFORNIA REPORTING, LLC** 52 Longwood Drive, San Rafael, California 94901 (415) 457-4417
1 benefits could be one of the answers for some of the 2 environmental justice issues. But focus on a handful of 3 the characteristics that the policymakers value, that we 4 deem valuable to the State.

5 And try to quantify them, if not in absolute 6 terms, at least in relative terms we can take every type 7 of generation -- generation technology and say, well, it 8 has more or less ability to do X or Y and that could, I 9 think, be part of the procurement planning process.

And I think it's important to note that the characteristics that we value, over time are going to change. We've seen that with solar, changing the peak, and changing the value of solar.

We live in a dynamic world and I think we need to keep ahead of it and recognize what we value, and try and quantify that, if only in relative terms to reflect what we're trying to accomplish policy-wise.

18 MR. ULRICH: I'll try to be quick. I would 19 agree that I think we're on track. It does sound like 20 everything's broken, but I think there's a lot of 21 success in multiple areas.

And I want to not slow things down, I think the pressure of moving, and thinking, and creating new ideas and new programs should continue. That pressure's good, it keeps us honest. But I do want to be careful we

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1 don't turn into the German solar coaster.

I also want to be careful that we see the price tag of what we're doing. Our 2002 RPS law and the revamp last year, the real costs of that are yet to be seen.

6 The transmission costs that Craig talked about, 7 is it going to hit rates in the next three years?

8 A lot of the movement that Aaron talked about, 9 moving from 14 percent to 19 percent, all of that's 10 going to start hitting rates on May 22nd, when we talk 11 about retail rates and cost issues.

I do not want to under-estimate the impact of the policies that have already been in place, but we haven't really seen the full price tag, yet.

So, let's be cautious, let's not have a whip saw of people who are behind renewables, let's get all these great benefits and then they pull back when they see the price, and then they're back in and they're back out. That's what Germany did and I don't want to do that in California.

MS. ZOCCHETTI: Thank you, and do we have Randy
Howard on the line? It doesn't look like it.

23 COMMISSIONER PETERMAN: Kate, any final

24 comments?

25 MS. ZOCCHETTI: No, other than just to thank

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1 everyone for coming in, to remind everyone that written 2 comments are due a week from today, on the 19th. And to 3 the points, and the questions, and the details that we 4 didn't get to, please make sure to -- if those are 5 important to you, to address those in your written 6 comments.

7 COMMISSIONER PETERMAN: Thank you very much,
8 this was a great first workshop. I learned a lot, a lot
9 of food for thought. I think we could continue
10 discussing these issues late into the evening, but save
11 your energy for our next workshops.

We have, actually, the next renewable strategic plan workshop is on May 10th, "Identifying Priority Geographic Areas for Renewable Development."

15 And then on April 30th, we have an IEPR workshop 16 on "Climate Change Adaptation," is that the right

17 general frame, here, if you're interested in that, as

18 well, because we still have some other IEPR workshops

19 happening in tangent.

20 But looking forward to seeing it next time.

21 Any final words, Chairman?

22 CHAIRPERSON WEISENMILLER: Yeah, again, I'd like 23 to thank everyone for their participation, encourage 24 people to file written comments.

25 And, also, the climate change, we really want to

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look at the implications of climate change for the energy system. So, certainly encourage everyone to listen and participate in that. We expect, obviously, higher loads. You know, certainly affecting our hydro might be affecting our vulnerability of our transmission system from forest fires. I mean there's a -- there was a snapshot of that in the Governor's Climate Change Workshop, in December, and the results were pretty staggering. So, again, certainly encourage everyone to participate in that. COMMISSIONER PETERMAN: And also, thank you again to all of our moderators and our staff. Have a good evening, everyone. (Adjourned at 5:13 p.m.)

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