

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

Order Instituting Rulemaking Regarding  
Policies, Procedures and Incentives for  
Distributed Generation and Distributed  
Energy Resources.

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RULEMAKING 04-03-017  
(Filed March 16, 2004)

CEC Docket No. 04-DIST-GEN-1  
and 03-IEP-1

**REPLY COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)  
ON DRAFT ORDER TO MODIFY THE SELF GENERATION INCENTIVE  
PROGRAM AND IMPLEMENT ASSEMBLY BILL 1685**

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**04-DIST-GEN-1**

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**I. INTRODUCTION**

SCE has long supported cost-effective Distributed Generation (DG) and will continue to do so, consistent with the goals of the California Legislature and this Commission. This does not mean, however, that SCE is compelled to blindly support the continued efforts of some DG participants to institutionalize a DG subsidy at the expense of utility ratepayers. The Self Generation Incentive Program (SGIP) was originally conceived during the California Electricity Crisis to encourage the use of DG as a way of curtailing demand for electricity and reducing load during peak and not as a means to sustain the DG industry.<sup>1</sup> Half a billion dollars of ratepayer money was earmarked to encourage customers to utilize distributed generation with the expectation that all ratepayers would benefit from a greater reliance on self-generation. AB 1685 expanded this budget to \$875 million through the end of 2007.

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<sup>1</sup> For instance, in objecting to the reduction in the incentive for Level-1 from \$4.50/watt to \$3.00/watt, Powerlight Corporation (Powerlight) stated, "There is no market evidence to suggest that the PV industry could adapt to, much less thrive with this proposed 33% drop in rebate levels." Powerlight Comments, p.2. VoteSolar goes so far as to recommend that the CPUC "Order the Working Group to determine an exit strategy that creates a sustainable solar industry in California." VoteSolar Comments, p.1.

Thus, ratepayers have already been asked to shoulder \$875 million in direct subsidies without any cost-benefit showing. Parties now seek through their comments to expand the SGIP program, notwithstanding the fact that there is still no evidence in this or any other record that expansion of the SGIP program beyond that provided in AB 1685 is justified. Given the significant cost to non-participating ratepayers, the Commission should withhold any action to expand the SGIP program<sup>2</sup> until the pending cost-benefit analysis is completed. SCE also takes this opportunity to challenge proposals to (1) increase Level-1 incentives, (2) delay the effective date of the new emissions and efficiency standards, (3) ignore the actual utilization of waste heat at the host site, and (4) restructure the SGIP working group.<sup>3</sup>

## **II. REPLY COMMENTS**

### **A. SCE Opposes Increasing the Level 1 Incentive.**

Cal SEIA and Powerlight continue to advance the argument that the Level-1 SGIP per-watt rebate levels must remain higher than those offered in the CEC's program because commercial/industrial/government customers have much lower energy costs than residential customers.<sup>4</sup> This argument is seriously flawed.

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<sup>2</sup> Cal SEIA takes issue with SCE's position that increased SGIP funding is unnecessary in SCE's territory due to a current over collection of approximately \$92 million. Cal SEIA claims that this is due to information on SCE's website concerning available SGIP funds, and that the Commission should "investigate" the "lack of participation" in SCE's territory. Such an investigation is unnecessary. As SCE stated in its opening comments, currently, more than 50% of the projects in SCE's territory drop out before completion and before being allocated any SGIP funds. SCE Comments, pp. 6-7. As such, SCE's website makes clear that SCE is still accepting applications for the SGIP program. SCE will update its website consistent with the DD (pp.8-9) to include the amount of funds reserved, paid, and available in each level, funds transferred between levels, and installed and reserved generating capacity.

<sup>3</sup> Because of page limitations, SCE could only respond to some of the issues raised by the parties that seriously depart from the original intent of the legislature and the Commission's development of the SGIP. Thus, SCE's silence in any particular subject area should not indicate its acceptance of the position(s) presented. For example, SCE opposes but could not specifically address proposals to move funds between administrators. Additionally, SCE supports the Working Group's comments, as well as PG&E's and SDG&E's comments.

<sup>4</sup> For instance, Cal SEIA states at page 3 of its comments that "the residential rate in California IOU service territories is twice that of commercial rates resulting in very different customer

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First, the rates cited by both parties in their comments are simply not accurate. Small/Medium Industrial customer rates are *higher* than residential rates. Moreover, the fact that commercial & industrial customers may have recently been able to enjoy reductions in energy prices should not serve as justification to increase the subsidy levels. Second, contrary to Cal SEIA's belief that incentives should be based on a customer's "rate and investment structure,"<sup>5</sup> incentive levels were correctly established based on installed costs. The fact that various customers have different motives or incentives for investment is immaterial. Third, incentive levels for DG intended for commercial, industrial and government customers should be lower than incentives provided for small commercial and residential customers in the CEC's program because the project costs are likely to be lower due to the size of the installations.<sup>6</sup>

**B. SCE Supports the Commission's Decision to Adopt Staff Recommendations on Verification of AB 1685 Emissions Requirements.**

SCE concurs with the recommendation to adopt the Energy Division's recommended methods for verifying a DG unit's emissions through (1) CARB certification, or (2) submitting manufacturer specifications, submitting a permit to operate, and submitting project-specific efficiency calculations. Requests from CEERT and CCDC that the Commission develop details on "sufficient" manufacturer emission specifications are not needed. AB 1685 and the Commission provided sufficient detail for the implementation program requirements.

The Commission should not adopt CCDC's proposal to delay the effective date of the new emissions and efficiency requirements by 90 days after the handbook revisions are adopted. According to the plain language of AB 1685, the emission requirements are

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economics and incentive requirements." Powerlight claims that "the higher avoided utility costs for residential customers allow the residential solar market to thrive with lower per Watt rebate levels." Powerlight Comments, p.3.

<sup>5</sup> Cal SEIA Comments, p. 3.

<sup>6</sup> Powerlight acknowledges this: "Economies of scale on the commercial side result in lower installed cost for the end-use customer and long-term savings..." Powerlight Comments, p.3.

effective January 1, 2005. Nor should the Commission require development of promoting mechanisms for those technologies that cannot meet the new emission standards. SCE supports the intent of AB 1685 to encourage participation of cleaner generating technologies in the program. AB 1685 did not intend to provide dirtier combustion technologies "time to catch-up" or mechanisms for allowing ineligible technologies to participate while delaying or displacing implementation of clean generators.

**C. SCE Reiterates the SGIP Working Group's Request for Clarification of the AB 1685 Minimum Efficiency Requirement.**

SCE believes that Public Utilities Code section 218.5 waste heat utilization requirements are still required, along with the AB 1685 efficiency standard to ensure that sufficient waste heat is utilized to maintain high fossil fuel efficiency. However, SCE recognizes that AB 1685 does not specifically address the retention of PUC 218.5 requirements in future program years, and therefore requests clarification that this requirement will be retained until it is verified that AB 1685 is at least as stringent as PUC 218.5.<sup>7</sup>

Compliance with PUC 218.5 has been an issue in past projects. According to Itron's Third-Year Impact Assessment Report, preliminary data suggests the possibility of systemic negative variance between planned and actual system efficiencies. Only 2 of 20 monitored Level-3 cogeneration systems appear likely to achieve the 42.5% PUC 218.5 (b) efficiency on an annual basis.<sup>8</sup>

**D. SCE Supports the DD's Proposal for Stakeholder Workshops.**

SCE fully supports the Draft order's proposal for stakeholder workshops to establish a waiting-list protocol, a declining rebate strategy, an exit strategy, and a data release

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<sup>7</sup> SCE objects to UTC's and CCDC's proposal to base the AB 1685 efficiency requirement on manufacturer specifications alone and not address the actual utilization of the waste heat at the proposed Host Customer site.

<sup>8</sup> See the CPUC Self Generation Incentive Program Third Year Impacts Assessment Report, pp. 10-15.

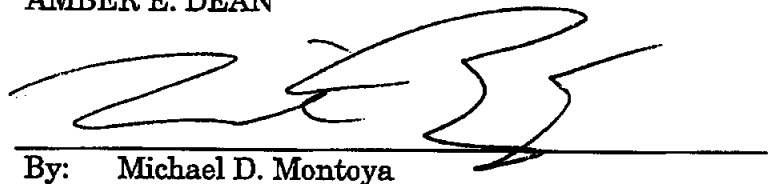
format. These workshops will enhance collaboration among stakeholders. SCE, however, objects to the expansion of the SGIP Working Group (WG) to include non-administrator stakeholders, and opposes the use of ratepayer funds to pay stakeholders to participate in SGIP workshops. The Commission established the WG to implement policy and program design and ensure uniform implementation of the program in all of the administrator service territories.<sup>2</sup> Contrary to some of the submitted comments, the WG was *not* established to debate, discuss or develop new policy or new program designs.<sup>10</sup> Expanding the WG to include non-administrators will not serve the purpose of improving the policy and program design, but will only result in protracted debate about implementation details.

### **III. CONCLUSION**

SCE respectfully requests the Commission modify the DD consistent with these and SCE's Opening Comments.

Respectfully submitted,

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<sup>2</sup> D.01-03-073 (March 27, 2001).

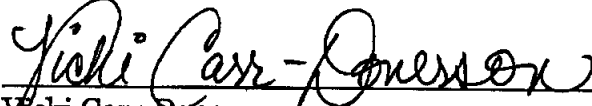
<sup>10</sup> See, e.g., Cal SELA Comments, p. 7; Powerlight Comments, p.4.

## CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of Reply Comments of Southern California Edison Company (U 338-E) on Draft Order to Modify the Self Generation Incentive Program and Implement Assembly Bill 1685 on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- ☒ Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (Via First Class Mail):
  - ☒ To all parties, or
  - ☐ To those parties without e-mail addresses or whose e-mails are returned as undeliverable;
- ☒ Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or the other addressee(s);
- ☒ Transmitting the copies via e-mail to all parties who have provided an address.

Executed this 15th day of November, 2004, at Rosemead, California.

  
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BERKELEY LAB  
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CATHERINE E. YAP  
BARKOVICH & YAP, INC.  
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OAKLAND, CA 94611  
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LEGAL & REGULATORY DEPARTMENT  
CALIFORNIA ISO  
151 BLUE RAVINE ROAD  
FOLSOM, CA 95630  
R.04-03-017

CALIFORNIA ENERGY MARKETS  
517-B POTRERO AVE.  
SAN FRANCISCO, CA 94110-1431  
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CASE ADMINISTRATION  
SOUTHERN CALIFORNIA EDISON COMPANY  
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ROSEMead, CA 91770  
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MRW & ASSOCIATES, INC  
1999 HARRISON STREET, SUITE 1440  
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