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May 6, 2005

04-DIST-GEN-1

California Energy Commission
Docket Office
Attn: Docket Nos. 04-DIST-GEN-1 and 04-IEP-01
Docket Unit, MS-4
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DOCKET
04-IEP-1
DATE MAY 06 2005
RECD. MAY 06 2005

Re: Distributed Generation and Distributed Energy
Resources CPUC Docket No. R04-03-017/ CEC
Docket No. 04-DIST-GEN-1 and 04-IEP-01

Dear Docket Clerk:

SCE would like to submit the enclosed comments on the California Energy Commission Integrated Policy Report Committee's April 28, 2005 Workshop on California's Market Potential for Combined Heat and Power and Distributed Generation.

Please do not hesitate to contact me at (626) 302-6961 if you have any questions.

Sincerely,

Amber Dean

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Enclosure(s)

BEFORE THE CALIFORNIA ENERGY COMMISSION

Exploring Issues Associated with)	CEC Docket No. 04-DIST-GEN-1
Implementation and Distribution Planning)	and 03-IEP-01
of Distributed Generation)	
)	
Order Instituting Rulemaking Regarding)	CPUC Docket R.04-03-017
Policies, Procedures, and Incentives for)	
Distributed Generation and Distributed)	
Energy Resources)	
)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS
ON THE CALIFORNIA ENERGY COMMISSION INTEGRATED POLICY
REPORT COMMITTEE'S APRIL 28, 2005 WORKSHOP

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**Comments of Southern California Edison for the California Energy Commission
Integrated Energy Policy Report Committee's April 28, 2005 Workshop on
California's Market Potential for Combined Heat and Power and Distributed
Generation**

I. Introduction

SCE commends the Integrated Energy Policy Report Committee for its leadership in sponsoring this workshop on market potential for additional combined heat and power (CHP) applications in California. The "Assessment of California CHP Market and Policy Options for Increased Penetration" (Assessment Report), a report prepared under the California Energy Commission's (CEC) PIER Program, formed the basis of a number of the presentations on the main theme of the workshop and provided a potent catalyst for discussion. A preliminary review of this voluminous document indicates that many of its findings are in general agreement with SCE's experience in working with customers to facilitate installation of CHP projects on its electric system. The Assessment Report does, however, contain certain policy recommendations which are premature or improvident. Although SCE has not had an opportunity to fully review and analyze the models used to evaluate the policy options discussed in the Assessment Report, SCE provides these general comments to guide the CEC's overall approach in recommending policies concerning CHP.

Additionally, SCE will provide brief comments on an issue raised in an unexpected departure from the main course of the workshop, wherein two organizations that represent developers of large industrial CHP projects made presentations to draw the Committee's attention to the needs of projects already constructed and in operation. In particular, their comments focused on Qualifying Facility (QF) projects that signed power purchase contracts with California's investor owned utilities during the 1980s.¹ In consideration of the significant amount of workshop time devoted to this topic, SCE will offer some comments to balance the record.

II. Concerns with the CHP Market Assessment

Although the Market Assessment appears to be thorough, by design it fails to incorporate the perspectives of stakeholders other than Distributed Generation (DG) interests, such as non-participants, utilities, regulators, and ratepayer interest groups. Further, although the CEC does an excellent job in advertising the workshops related to DG issues, DG interests typically represent a disproportionate number of the workshops participants, resulting in a tendency of the workshops and associated reports to emphasize the benefits of DG without focusing on the costs. Any structured program or incentive to increase CHP installations – such as "net metering" for large CHP installations – will come with a cost to nonparticipating ratepayers. Given the already high costs of energy, ratepaying

¹ See CAC/EPUC (oral presentation in CHP users' round table discussion); California Cogeneration Council Comments.

customers deserve meaningful assurances that DG programs are designed to maximize ratepayer benefit. To that end, the CEC must evaluate policy and program design recommendations with the maximum amount of information available, with an overall objective of ensuring that ratepayer burden results in ratepayer value.

There are a number of open proceedings at the Public Utilities Commission, including the DG OIR, Avoided Cost OIR, Resource Adequacy, and RPS OIR, which will provide the CEC with information necessary to make informed policy decisions about the different DG technologies and applications. Further, recent changes to existing programs and tariffs may influence policy decisions, but the impact of these changes has not yet been evaluated. For instance, as of 2005, projects up to 5 MW may participate in the Self Generation Incentive Program (SGIP),² and the “percent of project cost cap” has been eliminated. Further, new standby rates went into effect on April 14, 2005. The impact of these new rates on DG installations has not yet been determined.

The Assessment Report may be a useful tool for policymakers to determine the future direction for DG once these various proceedings are complete and recent changes have been evaluated. However, it is premature to make any of the recommended policy changes until (i) the cost-benefit models and evaluation tools are developed; (ii) actual values for avoided costs are determined; (iii) rules regarding participation of DG in RAR and RPS programs are determined; and (iv) data collection needs are evaluated. In fact, the models and results used in the Assessment Report are premature because the cost-benefit methodology and input values presently being considered by the CPUC have not been completed. One workshop participant implied that the CEC should disregard this analysis and urged that it “stop talking” and issue a decision. While certain operators of large cogeneration facilities may want the State to leap before it looks, SCE cannot condone such an approach, particularly when its ratepayers will be footing the bill.

Indeed, the analysis discussed above is much needed to ensure that ratepayers are getting the purported benefits for which they are paying. For example, current analysis of cogeneration projects subsidized by the SGIP shows that 70-90% of the natural gas-fired projects fail the minimum performance requirements for participation in the Program.³ Moreover, there is currently no mechanism in place to ensure that cogeneration systems will continue to operate as gas prices increase. Disregarding such information and failing to establish data collection and measurement procedures will merely facilitate inequitable risk and cost shifting to nonparticipating ratepayers. Any policy options ultimately recommended by the CEC should not shift costs to nonparticipating customers without cognizable overriding benefits.

² The SGIP is currently funded through the end of 2007, not 2014 as mentioned in the Market Assessment.

³ See Itron Fourth-Year Impact Report, p. 1-4. “Metered data collected to date suggest that nine of the 31 monitored Level 3/3-N projects achieved the 218.5(b) overall system efficiency target of 42.5%.” The Third-Year Impact Report contains even poorer results, showing that approximately 90% of the cogeneration projects evaluated did not meet the required efficiency levels. Itron Third-Year Impact Report pp.9-25 through 9-26.

III. Comments on the Large QF Users' Presentations

Broadly summarized, the large users appearing at the workshop urged the Commission to support, among other things, a CPUC mandate for utilities to sign long term contracts with new and existing cogeneration qualifying facilities (QFs); a preferential set-aside of utility capacity to be met by cogeneration QFs; and a portfolio standard for CHP similar to that enacted by the Legislature for renewable resources. They also cite the necessity of dealing with the CAISO as a barrier. In its written comments, the California Cogeneration Council asserts that "[t]he CAISO has not devoted significant attention to streamlining its regulations or procedures to accommodate large numbers of small, distributed generators."⁴

These comments should be disregarded as outside the scope of this proceeding. Moreover, all of the concerns and issues raised at the workshop are being fully and adequately addressed in proceedings before the Public Utilities Commission, the state agency charged with implementing the PURPA, which governs the contractual relations between utilities and qualifying facilities, such as the non-utility generators represented at the workshop. Specifically, the CPUC is currently examining the State's long-term policy with respect to expiring and new QF contracts in R.04-04-025. Testimony concerning these issues, and related pricing matters, will be submitted in July and hearings are scheduled to begin in August. SCE recognizes the potential value of extending the operation of existing QFs beyond the terms of their existing contracts, provided that replacement agreements fully comply with PURPA and otherwise meet the State's resource adequacy and other policy objectives on a least cost/best fit basis. The notions of cogeneration set asides, mandatory purchase obligations, and portfolio standards have all been advanced by cogeneration interests in predecessor dockets and will likely be advanced in upcoming evidentiary hearings. Moreover, to the extent that the recommendations in the Assessment Report are based on perceptions of some CHP users that existing CAISO rules and procedures are preventing development of new projects, the first priority should be to engage affected parties in a collaborative effort to address issues with the CAISO. Blindly shifting obligations and costs associated with the CAISO's current rules and practices to utilities (and their other customers) is not a solution.

IV. Conclusion

SCE appreciates the opportunity to comment on the Assessment Report and presentations made at the April 28, 2005 workshop. SCE looks forward to the resolution of these issues through an established evidentiary record and well thought policy formation.

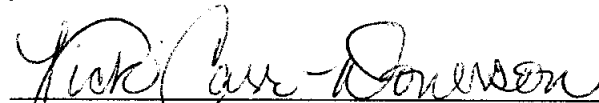
⁴ In enumerating the projects that CAC/EPUC represented at the workshop, its spokesman cited typical project sizes ranging from 225 MW to more than 400 MW.

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 **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON THE CALIFORNIA ENERGY COMMISSION INTEGRATED POLICY REPORT COMMITTEE'S APRIL 28, 2005 WORKSHOP** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this 6th day of May, 2005, at Rosemead, California.



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Friday, May 6, 2005

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